

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

AT

OMEGA CAPITAL, LLC

130900 Lockwood Road

Gering, NE 69341

(308) 436-0004

EPA ID Number: Non-notifier (will be assigned NER000004077)

ON

March 25-26, 2014

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region VII

Environmental Services Division

1.0 INTRODUCTION

At the request of the Air and Waste Management Division (AWMD), I performed a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Omega Capital, LLC located in Gering, NE on 3/25-26/2014. I conducted the inspection under the authority of RCRA Section 3007(a), as amended. During the inspection, I collected the information and data necessary to determine compliance with the applicable regulatory and statutory requirements. This report and attachments present the results of the inspection. Based on the information obtained during the course of the inspection, I inspected Omega Capital as a conditionally exempt small quantity generator (CESQG) of known hazardous waste, used oil generator and small quantity handler of universal waste (SQHUW). However, additional hazardous waste determinations need to be made that may affect this CESQG status determination. According to the U.S. Environmental Protection Agency RCRAInfo database, this facility has not been previously inspected for RCRA compliance.

2.0 PARTICIPANTS

Omega Capital, LLC (OC):

Doug Williams, General Manager (since about 7/18/2013 in position and with the company)

Margaret Ain, Quality Manager (since about 2012 in position and with the company)

Lanny Hanks Investigations:

Lanny Hanks, Security and Criminal/Civil Investigations (working with OC since 7/9/2013)

MMA Environmental, LLC (Omega Capital's Consultant):

Scott Perkins, Senior Consultant (working with Graham-White Manufacturing Co. (GW) for about two weeks)

Nebraska Department of Environmental Quality (NDEQ):

Brian Gorman, Program Specialist

U.S. Environmental Protection Agency (EPA):

Dedriel L. Newsome, Environmental Engineer (Lead Inspector)

Kevin Snowden, Environmental Scientist, RCRA Compliance Officer

3.0 INSPECTION PROCEDURES

On 2/5/2014, OC self-disclosed pursuant to the *Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations*, 12/22/1995 policy. Also, they were scheduled to shut down soon. Therefore, on 3/17/2014, Belinda Holmes, EPA General Counsel, informed Daniel Summerlin, OC's Attorney, that EPA would be conducting an inspection at OC starting on 3/25/2014 at 8:00 A.M.

On 3/25/2014 at about 8:00A.M., Mr. Gorman, Mr. Snowden and I arrived at the facility. We met Ms. Ain, Mr. Williams, Mr. Perkins and Mr. Hanks. We introduced ourselves and I explained the purpose and procedures of the inspection. We presented our credentials. The facility representatives were made aware of the facility's confidentiality rights and informed that a Confidentiality Notice would be provided at the end of the inspection to make any claims. They were also provided with a copy of Section 3007 of RCRA and U.S. Federal Code 1001 and 1002, concerning false statements and documents, to read.

I discussed with the facility representatives the facility operations, wastes generated and waste management practices. Mr. Gorman, Mr. Snowden and I conducted a visual inspection of the facility accompanied by Mr. Williams, Ms. Ain and Mr. Perkins. I reviewed various records including facility layouts and shipping documents. I completed documents (inspection forms and checklists) and obtained additional reference documents that are included as attachments 1 through 10. This includes an Entry/Exit Checklist (see attachment 1). Also, I collected photographs with a digital camera. They are included as photos 1 through 77 and are listed in the attached photo log.

At the conclusion of the inspection, I summarized my findings and recommendations with Mr. Williams, Ms. Ain and Mr. Perkins. Mr. Snowden and Mr. Gorman were also present. I provided Mr. Williams with a Confidentiality Notice, Receipt for Documents and a Notice of Violation (NOV), which he signed as acknowledgment of receipt (see attachments 2 through 4). No confidential business claims were made. The compliance assistance documents provided during the inspection are listed on the Entry/Exit Checklist (see attachment 1, page 2). On 4/1/2014, I uploaded the 77 inspection photos to the Faulkner & Flynn Environmental Management Consultants website as requested (see attachment 5 for related documents). Also, on 4/4/2014, I spoke with Mr. Williams to ask additional questions/clarifications.

The inspection procedures followed were in general as discussed in the RCRA CEI Standard Operating Procedures unless noted differently. Also, any authorized federal regulatory citations noted in this report are as adopted by reference in the authorized Nebraska state regulations.

4.0 FINDINGS AND OBSERVATIONS

This section of the report is divided into five parts: **4.1** General Information/Facility Operations; **4.2** RCRA Status; **4.3** Waste Streams/Management; **4.4** Self-Disclosure; and **4.5** Violations/Issues.

4.1. General Information/Facility Operations

OC conducts locomotive repair, overhaul, fabrication, and related services. They also sell locomotive components including new and reconditioned core components. OC is located on the Agromac, Inc. RCRA post-closure permitted site. The history of the permitted site may be obtained from the Agromac

facility files. OC's purchasing and ownership details regarding the facility are complex and explained in the self-disclosure letter (see attachment 6A). OC is surrounded by other businesses and some residences. An aerial photo and layout of the facility are included as attachments 7A and 7B.

Currently, OC is conducting limited operations and planning to shut-down. They have four full-time and two part-time employees. The facility is operated from 7:00 A. M. to 4:30 P. M., Monday through Thursday and half a day on Fridays. Mr. Williams stated that he announced the shut-down in February 2014 and they started shutting down in March 2014. He stated that they are currently working on the last two components (blower fans). They are expected to be completed by Friday, 3/28/2014, after which the facility will be shut-down.

Mr. Williams stated that fabrication and welding are the only two processes being used to complete the last two components. Therefore, the remaining inventory for the unused processes is being consolidated, i.e., removed from storage racks and inventoried. Mr. Williams stated that they are actively looking for potential buyers for the remaining materials/equipment. Mr. Williams stated that they have talked about the leftover materials with past customers that will now be doing their own repairs since OC has closed. Mr. Perkins stated that their current priorities are making hazardous waste determinations on the remaining wastes on-site and determining the corrective actions for the self-disclosure items discussed below.

Prior to shutting down, OC worked on both large and small components. Mr. Williams stated that OC did the labor and the customers supplied the parts. The processes used were as follows:

A. Large Components Process – The large parts consisted primarily of locomotive engines.

Mr. Williams estimated that they worked on about eight engines since he was hired (i.e., about one engine per month).

1. Received engines from off-site customers (e.g., BNSF, Union Pacific) – Engines may have arrived with or without oil.
2. Unloaded the engines inside the facility.
3. Tore down the engines – Included draining any engine oils if present.
4. Cleaned the engines to remove any oils and grease – Conducted in a wash bay by spraying solvents onto the parts using spray bottles prior to washing them with hot pressure water.
5. Inspected the engines – Conducted visually and/or using air pressure tests.
6. Reassembled the engines – Conducted mechanically and using some silicone sealant for gaskets.
7. Returned engines to customer – No packaging was required other than maybe wrapping in plastic.

B. Small Components Process – The small parts varied and may have been worked on or fabricated depending on the customers' request. They included locomotive batteries, small refrigerators, rocker arms, water pumps, air compressors, starter motors, power assembly lines, blowers/fans, after coolers, old coolers, radiators, charge air coolers, traction motor gear boxes and cooling fans. The number of parts worked on varied based on the customers' requests.

1. Locomotive Batteries Process

- i. Received batteries on-site.
- ii. Tested the batteries.
 1. If only needed a charge, then recharged and returned to customer.

2. If needed more than a charge, then analyzed to determine if there were any dead cells and depending on results:
 - a. Recharged and returned to customer;
 - b. Repaired (i.e., added distilled water) if four or less cells were dead; or
 - c. Scrapped (i.e., sent off-site for recycling) if more than four cells were dead.
2. Other Small Components Repaired Process – Mr. Williams stated that the other small parts repaired were handled similarly to the large parts. However, some small parts went through additional processes as needed including the following: refrigerant was removed from and replaced in the small refrigerator units; radiators were tested using soapy water and may have been brazed; water pumps were cleaned in a sand blasting cabinet to remove rust (see photos 1 and 15); engine valve covers were sand blasted outside (see photos 71 through 73); some parts were painted in a small bench type booth (see photos 9 and 12) or throughout the facility using aerosols or gun spray pots; and water pumps, blower/fans, after coolers, charge air coolers and traction motor gear boxes were washed in one of three large hot water washer units (see photo 19) or in one of three small parts washer units (see photo 16);
3. Other Small Components Fabricated Process – Some metal parts, e.g., locomotive tool boxes and cabinets, were fabricated by cutting, bending and welding (MIG and stick) as needed.

4.2. RCRA Status

According to the EPA RCRAInfo database, OC had not notified as a hazardous waste generator. They had just recently submitted a notification about a week or less prior to the inspection (what they notified as was not determined prior to completing this inspection report). Therefore, I did not ask the facility representatives to complete a RCRAInfo form during the inspection.

At the time of the inspection, I determined that OC was an CESQG of known hazardous waste, a used oil generator and an SQHUW. However, additional hazardous waste determinations need to be made, as discussed below, that may affect the CESQG status determination.

Failing to Notify (Not listed on the NOV) – According to Title 128, Chapter 4, 003, a generator must submit a notification of hazardous waste activity to the Director. Since Mr. Williams was hired, it appears that OC had one known hazardous waste shipment. It consisted of 11 drums (4950 pounds) of D008 (lead) hazardous waste on 11/13/2013. However, at the time of the inspection, the source of this waste was unknown as discussed below in waste stream #3. Since over 2200 pounds of hazardous waste was shipped off-site on 11/13/2013, it appears that OC should have notified as a small quantity generator (SQG) or large quantity generator (LQG) as applicable (i.e., if over 2200 pounds were generated in a month, then as a LQG; if between 220 and 2200 pounds were generated in a month, then as a SQG; or if less than 220 pounds were generated in a month, then as a SQG when over 2200 pounds had accumulated on-site). As stated above, OC had not notified until just recently.

4.3. Wastes Streams / Management

The following should be noted regarding the waste stream discussions below:

- Mr. William was hired on 7/8/2013 as General Manager and Ms. Ain during 2012 as Quality Manager. Ms. Ain stated that she was not directly involved with the waste management. The previous management no longer worked at OC. Therefore, Mr. Williams and Ms. Ain were not able to answer all questions regarding waste management prior to their employment. The information they provided was primarily as operations were after they were hired or how they were told operations were prior to their employment.
- OC was in the process of shutting down and therefore, there were many various materials leftover. As discussed below in Section 4.5, the wastes remaining on-site that were not generated/handled/used by the current management will be characterized due to the current management not knowing the source of all past waste streams and what chemicals may have been mixed together.
- As discussed in Section 4.4 below, OC had self-disclosed on 2/5/2014 that prior to Mr. Williams being hired, used oil, likely containing spent solvents, was disposed directly onto the ground both on- and off-site, the liquid contents from locomotive batteries were drained directly onto the ground on-site, and a pit was excavated on-site and some waste material, likely used oil or used oil contaminated soil, was disposed in it. Also, on 3/12/2014, they self-disclosed that on 3/10/2014 the water was turned on in the evaporator unit and it overflowed both inside and outside the facility.

The following is a discussion of the waste streams discussed and the related violations/issues:

#	WASTE NAME	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
1	Used Oil	Used oil consisted of the following: oils from engines, traction motors (gear casing oils) and air compressors received on-site for repair; air compressor oil from two on-site rotary air compressors; hydraulic fluid from various on-site equipment (e.g., forklifts) maintenance; and refrigerant compressor oil.	The used oil purchased by Safety-Kleen was handled as used oil. Also, see Sections 4.4 and 4.5.1 regarding the self-disclosure and hazardous waste determinations needed.	The used oil generation rate varied based on products received on-site. On 9/20/2013, there was a 2162 gallon shipment to Safety-Kleen (see attachment 6B, page 80). I observed leftover oil related materials on-site as discussed in Section 4.5.1.	The used oil was collected in small containers that were emptied into 250-gallon totes. The totes were stored in a "Hazardous Waste Storage Area," henceforth HW Storage Area (see attachment 7B). Also, see Sections 4.4 and 4.5.1 regarding the self-disclosure and hazardous waste determinations needed.	The used oil was purchased by Safety-Kleen, Richardson, TX, for an unknown type of recycling (see attachment 6B, page 82). Also, see Section 4.4 regarding the self-disclosure.
Used Oil Burner – There were two used oil space-heater burners on-site. Mr. Williams stated that he has not used the burners since they were not working properly. Ms. Ain stated that the burners were last used during the first winter she was hired. She stated that they ceased using them due to toxic emissions.						
2	Wash Bay Wastewater	OC has a wash bay where parts received on-site were sprayed with solvents prior to being washed with hot pressure water to remove oil/grease (see attachment 7B and photo 20). The wash bay wastewater was treated as shown in the process diagram included as Figure 1. The types of parts that were washed in the bay are shown on Figure 1. Also, damaged totes were washed in the bay prior to being sent to the city for recycling. Mr. Williams stated that the totes were empty and believed to have been used for some type of oil related waste storage.	See the discussion below and Sections 4.4 and 4.5.1 regarding the self-disclosure and hazardous waste determinations needed.	The wash bay wastewater generation rate varied depending on the parts received on-site. I observed leftover oil related materials on-site as discussed in Section 4.5.1.	The wash bay wastewater was treated as shown in Figure 1. Also, see Sections 4.4 and 4.5.1 regarding the self-disclosure and hazardous waste determinations needed.	See Section 4.4 regarding the self-disclosure.

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Hazardous Waste Determination Discussion – At the time of the inspection, the process shown in Figure 1 was determined to be a wastewater treatment system (WWTS) based on discussions with Mr. Gorman. Mr. Gorman stated that even though the WWTS did not have a discharge other than to the atmosphere, NDEQ would view it as a WWTS and OC would be meeting their Clean Water Act (CWA) limits by not having a discharge. Therefore, at the time of the inspection, the wastewater was determined to be RCRA exempt per its discharge to a WWTS. However, it should be noted that the facility representatives did not know why they were evaporating the wastewater instead of oil separating/discharging to the city sewer.						
3	Oily Evaporator Sludge / Oily Evaporator Waste	<p>The WWTS discussed in waste stream #2 generated two waste streams as shown in Figure 1:</p> <p>A. <u>Oily Evaporator Sludge</u> was removed from the evaporator unit (see photo 25). Mr. Williams stated that the evaporator was operated daily and was cleaned about once a year. However, he stated that it had not been cleaned since he was hired. Ms. Ain did not recall when it was last cleaned.</p> <p>B. <u>Oily Evaporator Waste</u> was generated when the evaporator unit malfunctioned or too much wash bay wastewater was generated to be treated as shown on Figure 1.</p>	See the discussion below and Sections 4.4 and 4.5.1 regarding the self-disclosure and hazardous waste determinations needed.	The generation rates of the oily evaporator sludge and waste were unknown, although see the discussion below. Mr. Williams stated that he has not cleaned or removed any waste from the evaporator unit to date. I observed leftover oil related materials on-site as discussed in Section 4.5.1.	The oily evaporation sludge and waste were collected in drums and totes. They were stored in the HW Storage Area. Also, see Sections 4.4 and 4.5.1 regarding the self-disclosure and hazardous waste determinations needed.	Some of the oily evaporator sludge appears to have been shipped off-site to CSI Waste Management, Bennett, CO (unknown for what). Also, see the discussion below and Section 4.4 regarding the self-disclosure.

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Hazardous Waste Determination (Additional Information Needed) – According to Title 128, Chapter 4, 002, a hazardous waste determination is to be made on all solid waste. Based on information obtained during the inspection, OC generated five oil related waste streams, excluding used oil filters and possibly floor sweepings. They were used oil (waste stream #1), wash bay wastewater (waste stream #2), oily evaporator sludge (waste stream #3A), oily evaporator waste (waste stream #3B) and parts washer waste (waste stream #4). There was an analysis conducted on “oily sludge” that showed it to be non-hazardous and there were past shipments of oil related wastes off-site. However, it was unclear if an adequate hazardous waste determination had been made on the oily sludge that was analyzed, which of the five specific waste streams were being shipped off-site, and which specific waste streams were referenced in the self-disclosure as being disposed on-site. It was unclear because of the following information:

- There was a 12/6/2012 CSI Waste Management Waste Profile (#113245CO) of “oily sludge” (see attachment 6B, page 86). The profile described the process generating the material as “residue oil removed from the parts. It is Mobil 6800 oil.” It determined the waste to be non-hazardous and appeared to reference an analysis that was completed on 12/6/2012 (11/29/2012 is the date samples were received by the lab). The analysis was for “Omega Capital Oily Sludge Waste Profile” (see attachment 6B, page 88). However, it was unknown specifically which of the oil related waste streams the non-hazardous sample was taken from or how it related to a D008 hazardous waste manifest shipment discussed below. Also, it should be noted that the analysis was a totals analysis of an oily waste. It is believed that the Toxic Characteristic Leachate Procedure (TCLP) was not conducted as the totals were less than 20 times the TCLP regulatory limit (lead is 5 mg/L and the result was 82 mg/kg and chromium is 5 mg/L and the result was 8.4 mg/kg). However, the profile states that the waste contained 5 to 30 percent free liquid, and also 30 to 40 percent “oil” and 60 to 70 percent “oil sludge.” No one knew how the sample was collected (the profile only notes that a composite sample was collected from the waste stream) or if it was representative (e.g., took into account both the liquid and solid phases).
- There have been the following non-hazardous shipments:
 - 10 drums of “oily sludge” (under non-hazardous profile #113245CO) on 12/20/2012;
 - 3 drums of “oily sludge” (under non-hazardous profile #113245CO) on 5/8/2013;
 - 2 drums of “oily sludge” (under non-hazardous profile #113245CO) on 6/6/2013; and
 - 1 drum of “oily sludge” (under non-hazardous profile #113245CO) on 7/2/2013 (was left over from the 6/6/2013 shipment).
- Ms. Ain recalled that sometime in 2013, Panhandle Environmental Services sampled some oily sludge and then collected approximately four shipments of the waste. However, she did not know exactly which waste stream they collected.
- There was a manifest shipment of D008 hazardous waste liquid (11 drums, 4950 pounds total) collected by Safety-Kleen on 11/13/2013 (see attachment 6B, pages 77 and 85). At the time of the inspection, the source of this waste stream was unknown by Mr. Williams or Ms. Ain. They contacted Safety-Kleen during the inspection to obtain additional information regarding the shipment. However it was not received prior to my completing the inspection. According to OC’s Material Requisition for this shipment, it consisted of “sludge waste” (see attachment 8).
- Mr. Williams stated that he has not cleaned or removed any waste from the evaporator unit since hired.

Since the above information was unclear at the time of the inspection and “sludge” had been shipped off-site as both hazardous and non-hazardous, I asked for additional information regarding the shipments of hazardous waste and the analysis. This information was to include what waste stream the D008 shipment consisted of, how it relates to the non-hazardous oily sludge shipped off-site and how the sample was collected for the analysis.

#	WASTE NAME	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
4	Spent Parts Washer Solvent/Aqueous Waste	The parts received on-site are cleaned in small and/or large parts washers (see photos 16 and 19). The large washers were aqueous type washers. See attachment 6B, page 1, for the types of solvents used in the washers and their Material Safety Data Sheets (MSDS). However, the facility representatives did not know what specific solvent, or mix of solvents, was used in each washer or what may have been added to them.	See Sections 4.4 and 4.5.1 regarding the self-disclosure and hazardous waste determinations needed.	Mr. Williams stated that he has not generated any wastes from the parts washers since hired. I observed leftover parts washer related materials on-site as discussed below in Section 4.5.1.	Mr. Williams stated that he has not generated any wastes from the parts washers since hired. Also, see Sections 4.4 and 4.5.1 regarding the self-disclosure and hazardous waste determinations needed.	Mr. Williams stated that he has not generated any wastes from the parts washers since hired. Also, see Section 4.4 regarding the self-disclosure.
5	Used Oil Filters	Used oil filters are generated from engines and air compressors received on-site for repair. Mr. Williams stated that they also found some automotive used oil filters on-site.	The used oil filters are handled as scrap metal.	The used oil filters are generated at about 10 filters per month according to Mr. Williams.	The used oil filters are punctured, drained and collected with the scrap metal.	The used oil filters are sent with the scrap metal to B&T Metals, Gering, NE, for recycling.
6	Sand Blast Residue	Sand blasting was conducted both inside and outside to remove rust and/or paint from parts. The blasting inside was conducted in one of two booths (see photos 1 and 15). The blasting outside was conducted on the southwest side of the facility (see photos 71 through 73). Mr. Williams stated that he knows of only sand blasting once outside since he was hired.	See Section 4.5.1 regarding the hazardous waste determinations needed.	See the discussion below and Section 4.5.1.	See the discussion below and Section 4.5.1 regarding the hazardous waste determinations needed.	Mr. Williams stated that he has not shipped any sand blasting waste off-site since hired.

Generation – Regarding the two booths inside, Mr. Williams and Ms. Ain stated that they have not cleaned the two booths since they were hired. Regarding the sandblasting area outside, Mr. Williams stated that about two months ago, they collected some sand blasting residue from the sandblasting area outside (Area 15 on attachment 4C, page 1). He stated that they placed it in a drum and it consisted of some sand that looked like it had been contaminated as it was discolored. Mr. Williams believed the contamination was some type of oil related waste as it was discolored with dark stains. He stated that the drum was currently located in the HW Storage Area. I observed one drum labeled as oily sand in the HW Storage Area (see attachment 4A, page 1).

#	WASTE NAME	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
7	Paint Waste	Various parts were painted using aerosols, except the exterior parts of engines and some fabricated parts which were painted using gun spray pots. They were painted as needed throughout the facility in the area where they were being worked on. Also, some aerosol painting was conducted in two small bench type booths as the one shown in photos 9 and 12. Mr. Williams stated that they last spray painted an engine block around December 2013. The paint waste generated consisted of spent thinner (type unknown) used to clean out the spray pots, aerosol liquid waste drained from the cans and empty punctured aerosol cans. The spent thinner and aerosol liquid were accumulated together.	The spent thinner/aerosol liquid was determined to be at a minimum a D001 hazardous waste. The empty aerosol cans were handled as scrap metal. Also, see the discussion below and Sections 4.4 and 4.5.1 regarding the self-disclosure and hazardous waste determinations needed.	The spent thinner/aerosol liquid generation rate was unknown. Ms. Ain did not believe any had been shipped off-site as the drum had not been filled. The punctured aerosol cans were collected with the scrap metal. I observed one drum of the spent thinner/aerosol liquid in the HW Storage Area. It was about half full (see photo 28). I observed leftover paint related materials on-site as discussed below in Section 4.5.1.	The aerosol cans were punctured at the time of generation in a unit attached to a 55-gallon drum with a filter. The spent thinner was added to this drum when it was generated. The punctured aerosol cans were collected with the scrap metal. Also, see the discussion below and Sections 4.4 and 4.5.1 regarding the self-disclosure and hazardous waste determinations needed.	The drum of spent thinner/aerosol liquid had not been shipped off-site to date. The punctured aerosol cans were collected with the scrap metal. Also, see the discussion below and Sections 4.4 and 4.5.1 regarding the self-disclosure and hazardous waste determinations needed.

Hazardous Waste Determination (Included as a part of NOV #1A) – According to Title 128, Chapter 4, 002, a hazardous waste determination is to be made on all solid waste. The spent thinner/aerosol liquid waste collected in the 55-gallon drum was determined to be at a minimum a D001 hazardous waste. However, it appears that a complete determination was not made for reasons discussed below in Section 4.5.1. Mr. Williams stated that they have not shipped any spent thinner/aerosol liquid waste off-site to date.

#	WASTE NAME	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
8	Spent Locomotive Lead-Acid Battery Wastes	<p>Spent locomotive batteries were received on-site for repair. They were tested, analyzed and either recharged, regenerated or sold as scrap. Mr. Williams stated that they last handled spent batteries around December 2013/January 2014.</p> <p>Also, Mr. Williams stated that they received approximately 15 to 20 automotive batteries (he believed mostly dry cells) from a customer with a load of locomotive batteries. He stated that they sent these batteries with the locomotive batteries to be scrapped.</p>	The spent lead-acid batteries were handled under the spent lead-acid batteries being reclaimed regulations in Title 128, Chapter 7, 012. Also, see the discussion below and Sections 4.4 and 4.5.1 regarding the self-disclosure and hazardous waste determinations needed.	Mr. Williams estimated that they handled about 100 spent batteries per month of which about 25 to 30 were scrapped and the remaining were regenerated on-site. The latest shipping documents are included as attachment 9. I did not observe any spent batteries on-site.	The batteries that were recharged or regenerated were stored in the Shipping/Receiving Area prior to being returned to the customers. The batteries that were scrapped were stored in the lean-to area shown in attachment 7B prior to being sent to a reclaimer. Also, see the discussion below and Sections 4.4 and 4.5.1 regarding the self-disclosure and hazardous waste determinations needed.	The recharged and regenerated batteries were returned to the customers. The scrap batteries were collected by B&T Metals, Gering, NE, who shipped them to a reclaimer. The latest shipping documents are included as attachment 9.

Applicability of the Lead-Acid Battery Regulations Discussion – Mr. Williams stated that they only recharged or added distilled water to the batteries and not any acid. He also stated that they did not remove any acid from the batteries. Mr. Perkins stated that the spent batteries were being managed under the spent lead-acid batteries being reclaimed regulations. Based on this, it appears that OC was a collector/generator of spent lead-acid batteries of which some were regenerated on-site and some were reclaimed off-site by someone else. As such, for the regenerated batteries, they were required to make a hazardous waste determination on the spent batteries. For the batteries sent off-site for reclamation, they were required to make a hazardous waste determination on the spent batteries and were subject to applicable provisions of land disposal restriction (LDR) regulations.

Old Battery Storage Area – Mr. Williams stated that when he was hired, approximately 32 batteries were being stored outside in Area 14 noted on attachment 4C, page 1 and in photo 75. Also, he stated that about 10 batteries were being stored in Area A noted on attachment 4C, page 1, although he was told that up to about 300 batteries were stored in this area in the past. Mr. Williams stated that they moved these batteries being stored outside under the lean-to (see attachment 7B). Also, see Section 4.4 regarding the self-disclosure.

#	WASTE NAME	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
9	Other Spent Batteries	Other spent batteries, e.g., rechargeable batteries from drills, were generated on-site from equipment. The exact type of batteries was unknown.	The other spent batteries were handled as universal waste.	The generation rate of the spent batteries was unknown, but believed to be small. They were last taken off-site around September 2013 according to Mr. Williams. I did not observe any other spent batteries on-site.	The other spent batteries were stored on a table in the Maintenance Supervisor's office according to Mr. Williams.	The other spent batteries were taken to Home Depot, Scottsbluff, NE, for recycling.
10	Spent Lamps	Spent lamps were generated from building maintenance. Both 4ft and 8ft fluorescent lamps were generated. The lamps located outside have not been changed that Mr. Williams or Ms. Ain were aware of.	The spent lamps were being handled as universal waste. Also, see Section 4.5.1 regarding the hazardous waste determinations needed.	The generation rate of the spent lamps was unknown. I observed about nine spent 4ft lamps in a box and three 8ft lamps in another box (see photos 31 and 32). Both boxes were dated 1/15/2014. Also, I observed lamps on-site as discussed below in Section 4.5.1.	The spent lamps were collected in boxes and stored in the HW Storage Area. Also, see Section 4.5.1 regarding the hazardous waste determinations needed.	Mr. Williams stated that he has not shipped any spent lamps off-site since hired.
Open Universal Waste Lamps (Not Listed on the NOV) – According to Title 128, Chapter 25, 012.04A, containers of universal waste lamps must be closed. At the time of the inspection, I observed the box of spent 8ft fluorescent lamps open (see photo 31). I discussed this with Mr. Williams and Mr. Perkins and they stated that it would be closed.						

Other waste streams and topics discussed included the following:

- Chemical Spill – There was a spill from a 250-gallon tote of oil related waste (unknown source). Mr. Williams and Ms. Ain stated that they only had photos of the spill and statements from others that it occurred, but no other information.
- Scrap metal – OC generated various types of scrap metal including lead bars removed from the top part of batteries (see photo 4) and refrigerator compressors. The scrap was sent to B&T Metals, Gering, NE, for recycling.
- Soldering Waste – OC used soldering irons with sponges. No soldering waste had been generated to date according to Mr. Williams.
- Portable diesel fuel tanks were stored in the back of a truck for refueling on-site forklifts. Mr. Williams stated that they have not generated any waste from this process since he was hired.

4.4. Self-Disclosure

On 2/5/2014, OC self-disclosed pursuant to the *Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations*, 12/22/1995 policy. They disclosed the following: (A) used oil, likely containing spent solvents, was disposed directly onto the ground on-site; (B) used oil, likely containing spent solvents, was also transported to an off-site farm for disposal; (C) the liquid contents from locomotive batteries were drained directly onto the ground on-site; and (D) three to four years ago a pit was excavated on-site and some waste material, likely used oil or used oil contaminated soil, was disposed in the pit that was then covered with soil and broken concrete. The disclosure details are included in OC's 2/5/2014 self-disclosure letter and in a 3/19/2014 email that OC submitted in response to EPA asking some additional questions (see attachments 6A and 6B).

Also, on 3/12/2014, OC phoned EPA and informed them that on 3/10/2014 the water was turned on in the evaporator unit, which ran all night and overflowed both inside and outside the facility.

During the inspection, the facility representatives discussed (as they were mostly told by current and former employees) each disclosure claim. This included for each claim the related waste streams, identifying the disposal areas for visual inspection/pictures/GPS readings, and providing additional information/clarifications. Following is the information provided and their apparent related violations/issues:

A. Used oil, likely containing spent solvents, disposed directly on the ground on-site.

See the disclosure documents in attachments 6A and 6B for the details OC stated about this claim. There were three main areas that Mr. Williams pointed out as being identified by former employees concerning this claim (see attachment 4C, page 1 and photos 48 through 49 and 54 through 59). They are noted as Area 3, 4 and 5 on attachment 4C, page 1. The GPS readings are included on attachment 10. I observed some dark stains on and just below the surface in the areas as shown in photos 48 through 50 and 55 through 58.

The exact type of waste that was disposed on the ground was unknown other than some oil related wastes. Based on information provided during the inspection, OC generated five oil related waste streams, excluding used oil filters and possibly floor sweepings, and two solvent related waste streams. They were used oil (waste stream #1), wash bay wastewater (waste stream #2), oily evaporator sludge (waste stream #3A), oily evaporator waste (waste stream #3B), parts washer solvent/aqueous waste (waste stream #4) and paint waste (waste stream #7). As discussed above in waste stream #3, there was an analysis conducted on "oily sludge" that

#	WASTE NAME	GENERATION PROCESS	HAZARDOUS WASTE DETERMINATION	ESTIMATED GENERATION RATE	ON-SITE MANAGEMENT	OFF-SITE MANAGEMENT
11	Floor Sweepings	The floor was swept with a push broom at the end of each shift in the areas where work was being performed. These areas included the starters, air compressors, radiators, refrigerators, power assembly, resister grids, engines, traction motors, after coolers, blowers/fans, welding shop, shipping/receiving and battery.	A hazardous waste determination had not been made on the floor sweepings.	The floor sweepings were generated at about one dust pan full per area according to Ms. Ain.	The floor sweepings were collected in containers with the general trash (see waste stream #14).	The floor sweepings were disposed with the general trash (see waste stream #14).
Hazardous Waste Determination (NOV #1(d)) – According to Title 128, Chapter 4, 002, a hazardous waste determination is to be made on all solid waste. A hazardous waste determination had not been made on the floor sweepings. The sweepings were believed to consist mostly of dirt.						
12	Spent Personal Protective Equipment (PPE)	Dedicated rubber gloves were worn when handling some chemicals. Disposable gloves were worn when handling some parts to get traction. Leather gloves were worn as needed during production in various areas.	A hazardous waste determination had not been made on the spent PPE.	The generation rate of the spent PPE was unknown.	The spent PPE was collected in containers with the general trash (see waste stream #14).	The spent PPE was disposed with the general trash (see waste stream #14).
Hazardous Waste Determination (NOV #1(e)) – According to Title 128, Chapter 4, 002, a hazardous waste determination is to be made on all solid waste. A hazardous waste determination had not been made on the spent PPE.						
13	Spent Rags	Rags were used throughout the facility to wipe employee hands and to clean/wipe down parts. Therefore, they may have been contaminated with oils and solvents used on-site.	The spent rags were RCRA exempt as they were sent for laundry.	The generation rate of the spent rags was unknown.	The spent rags were collected in containers throughout the facility along with employee uniforms.	The spent rags were sent to Ideal Linen, Gering, NE, for laundry.
14	General Trash	The general trash consists of refuse, paper, etc. Wood pallets were also sent for disposal.	The general trash was determined to be non-hazardous based on knowledge.	The general trash was collected about once per week.	The general trash was collected in two small (approximately two cubic yards) dumpsters.	The City of Gering, NE, collected the general trash and disposed of it in a sanitary landfill.

showed it to be non-hazardous and there were past shipments of oil related wastes off-site. However, it was unclear if an adequate hazardous waste determination had been made and which of the specific oil related waste streams were being shipped off-site and/or disposed on-site. I asked for additional information regarding the off-site shipments and analysis as explained above in waste stream #3. Mr. Williams believed as was told that some oily waste may have last been dumped in Area 3 around January 2013 and Areas 4 and 5 around February 2013. **Since the type of oil/solvent waste disposed on the ground was unknown, I listed it on the NOV for failing to have a hazardous waste determination made on it as required by Title 128, Chapter 4, 002 (see inventory items #3 and #4 on attachment 4C NOV list).** Also, it should be noted that according to Title 126, Chapter 18, 001.01, no person shall release, cause to be released or allow the release of an oil or hazardous substance or residuary products thereof, into, or upon the waters or land of the state, except in quantities, and at times and locations, or under circumstances and conditions as the Department approves (25 gallons on the land and any amount to a waterway as noted).

B. Used oil, likely containing spent solvents, transported to an off-site farm for disposal.

See the disclosure documents in attachments 6A and 6B for the details OC stated about this claim. The exact type of waste that was shipped off-site was unknown. The same five oil and two solvent related waste streams discussed above would also apply to this disclosure claim. **Since the type of oil/solvent waste shipped off-site was unknown, I listed it on the NOV for failing to have a hazardous waste determination made on it as required by Title 128, Chapter 4, 002. (NOV #1(f))** In addition, there was only one farm (Allen Bietal's farm) noted in the self-disclosure letter where the wastes were taken. During the inspection, Mr. Williams stated that he was told that there was another farm where about 75 totes of waste (unknown source) were allegedly taken. He stated that it was supposedly Roger Bietel's farm and that Roger Bietel has since traded his farm for a house. The farm owner is now Rhonda Pierce. Mr. Williams provided the first farm's (Allen Bietal's farm) address as 270927 County Road S, Gering, NE (straight east from OC on Highway 92 approximately 12 miles). At the time he did not have the second farm's address. Also, Mr. Williams stated that he was told that there was a burn pile at the farm.

C. The liquid contents from locomotive batteries being drained directly onto the ground on-site.

See the disclosure documents in attachments 6A and 6B for the details OC stated about this claim. As stated above in waste stream #8, OC only recharged or added distilled water to the batteries. Mr. Williams stated that they did not remove or add any acid from or to the batteries. He stated as he was told that the battery waste disclosed as being disposed on-site was generated from the battery transport containers. According to Mr. Williams, six to eight battery cells sit inside a transport container. He stated that some containers may have a lid and some may not. Mr. Williams explained that storm water may get into the transport containers during transport and consequently, they may arrive on-site with up to about eight gallons of liquid waste.

Mr. Williams stated that Glen Nelson told him that he drilled holes in the legs of the transport containers (see photo 13) so that the liquid waste drained onto the ground in Area 15 which is on an incline (see attachment 4C, page 1, photos 76 and 77 and attachment 10 for GPS reading). Mr. Williams stated that Mr. Nelson told him that the liquid burned like an acid when he came into contact with it. Mr. Williams stated that they had no other information on the liquid waste drained onto the ground. Mr. Williams stated that they did not drill any holes in the battery cell casings themselves and he was not aware of any arriving on-site cracked or broken. **I listed the battery waste disposed on the ground on the NOV for failing to have a hazardous waste**

determination made on it as required by Title 128, Chapter 4, 002 (see inventory item #12 on attachment 4C NOV list). Mr. Williams stated that after he was hired, they sent the spent batteries to the scrap broker (B&T Metal) with the liquid remaining in the transport container. He provided me with their past shipping documents included as attachment 9.

In addition, Mr. Williams stated that the battery transport containers with the holes were repeatedly reused to transport spent batteries to the reclaimers and return them to the customers. Based on this, any waste draining from the casings would be disposed wherever the batteries were being stored at that time. As stated in waste stream #8, the batteries were being stored outside in Area 14 and Area A (see attachment 4C, page 1 and photo 75) prior to being moved to the lean-to (see attachment 7B) after Mr. Williams was hired. I observed no apparent visible battery waste stains at the time of the inspection. **In addition, it appears that drilling holes in the transport containers may possibly be a violation of the Department of Transportation (DOT) shipping requirements.** I did not review this potential DOT violation any further due to inspection time constraints.

D. Unknown waste, likely used oil or used oil contaminated soil, disposed in an on-site pit and covered with soil and broken concrete.

See the disclosure documents in attachments 6A and 6B for the details OC stated about this claim. There were two areas that Mr. Williams pointed out as being identified by former employees concerning this claim (see photos 40 through 47). They are noted as Areas 1 and 2 on attachment 4C. The GPS readings are included on attachment 10. I observed some dark stained soil and a rag in the area (see photo 40). Mr. Williams stated he was told by Matt McConkey that the hole was dug around 2011 and it was about 10 feet diameter and eight feet deep.

All the exact types of waste that were disposed in the pit were unknown. For the oil/oil contaminated soil, the same five oil related waste streams discussed above would also apply to this disclosure claim. In addition, Mr. Williams stated that he was told that the previous management cleaned up an outside area located on the south side in the middle due to a scheduled audit by Faiveley Transport USA, Inc. prior to their purchasing GW. He was informed that it was cleaned by scraping off the top layer of soil and placing the waste in the pit. **Since the type of waste disposed in the pit was unknown, I listed it on the NOV for failing to have a hazardous waste determination made on it as required by Title 128, Chapter 4, 002 (see inventory items #1 and #2 on attachment 4C NOV list).** Also, it should be noted that according to Title 126, Chapter 18, 001.01, no person shall release, cause to be released or allow the release of an oil or hazardous substance or residuary products thereof, into, or upon the waters or land of the state, except in quantities, and at times and locations, or under circumstances and conditions as the Department approves (25 gallons on the land and any amount to a waterway as noted).

E. Evaporator overflowed both inside and outside the facility.

EPA was informed by OC that on 3/10/2014 the water was turned on in the evaporator unit and ran all night long (see the facility files for more details). Therefore, it overflowed both inside and outside the facility's overhead door (see photo 72) in the area noted as Area 11 on attachment 4C, page 1 (see photo 69). Mr. Williams stated that the overflow settled into three puddles on the ground in Area 11. He stated that they placed pig mats on top of the puddles and vacuumed the remaining wastewater into drums. I observed in the HW Storage Area 11 drums dated 3/11/2014 and labeled either oily water or oily sludge/solid from evaporator spill (see attachment 4A). **A hazardous waste determination was not made on this wastes as required by Title 128, Chapter 4, 002 (see Section 4.5 below and inventory item #9 on attachment 4C**

NOV list). Also, it should be noted that according to Title 126, Chapter 18, 001.01, no person shall release, cause to be released or allow the release of an oil or hazardous substance or residuary products thereof, into, or upon the waters or land of the state, except in quantities, and at times and locations, or under circumstances and conditions as the Department approves (25 gallons on the land and any amount to a waterway as noted).

4.5. Violations/Issues (includes those discussed above and others)

4.5.1 Hazardous Waste Determinations

According to Title 128, Chapter 4, 002, a hazardous waste determination is to be made on all solid waste. I observed the following materials that apparently needed a hazardous waste determination to be made:

1. Wastes Located in the HW Storage Area (NOV #1(a)) – I observed the approximately 53 containers listed in attachment 4A located in the HW Storage Area (see attachment 7B for layout and photos 28 through 31, 38 and 39). Mr. Williams and Mr. Perkins stated that they were containers of wastes that needed a hazardous waste determination, i.e., whether they were hazardous, non-hazardous or used oil. Mr. Williams stated that they were not comfortable using their knowledge to make the determinations for the materials the previous OC management generated/handled/used. He stated that they also do not trust the container labels as they do not know if something could have been added or changed from what it says. Therefore, they will be testing them all to make the hazardous waste determinations. Mr. Perkins stated that they were currently waiting on a second bid from Safety Kleen regarding these wastes. The containers were labeled as “Potentially Hazardous Waste Awaiting Analytical Results” (see photo 39) and/or “Unknown” (see photo 29). It should be noted that one of the unknown containers was full and bulging (see inventory item #2 on attachment 4A and photo 28) and one was dented along the bottom (see inventory item #10 on attachment 4A and photo 38). The containers were dated 3/3/2014 and 3/11/2014. However, Mr. Williams stated that some of the containers of unknown waste (i.e., waste not generated by the current management) were found outside prior to the 3/3/2013 date. He stated that they were found outside around August and December 2013, brought inside and then moved to the HW Storage Area around 3/3/2014. He stated that they cannot say exactly when the containers of waste were generated or placed where they were found as it occurred prior to him being hired.

Potential Incompatibles: It should be noted that in the HW Storage Area, I observed a lead-acid battery being stored. According to A Method for Determining the Compatibility of Hazardous Waste, EPA-600/2-80-076, April 1980, mineral oxidizing acids (sulfuric acid, see photo 30) and combustible/flammable materials (petroleum oils and solvents, see photo 28) are potentially incompatible as they may cause heat generation, fire and toxic gas generation. Mr. Perkins stated that they would have the battery removed. In addition, there may be potential incompatibles being stored without separation due to unknowns being stored. Mr. Perkins stated that making the hazardous waste determinations on the wastes is a priority as stated in Section 4.1 above.

2. Materials Located Throughout the Facility Inside (NOV #1(b)) – I observed the over 350 containers of leftover materials listed in attachment 4B located throughout the facility (see attachment 4B for locations and photos references). Some of the leftover chemicals were not used by Mr. Williams because after he was hired, they either changed the process or did not need to conduct that process. Mr. Williams stated that he announced the facility shutdown in February 2014 and started shutting down in March 2014. Inventory items #4 and #13 on attachment 4B had already been inventoried prior to the inspection according to Ms. Ain. Mr. Williams stated that they will start inventorying the remaining chemicals next week (3/31/2014). He stated that they plan to complete the inventory in about one to two weeks. Afterwards, they will arrange for sampling and/or shipping the materials off-site within approximately two months. A hazardous waste determination was needed on these leftover materials to determine if they would be disposed or used for their intended use. Mr. Williams stated that they have spoken with some of their customers who will start doing their own repairs since OC has closed. I informed Mr. Williams and Mr. Perkins that if any of the leftover materials were not waste and can be used for their intended use, they may respond as such and do not have to dispose of any materials just because they are on the NOV list.
3. Materials Located Outside (NOV #1(c)) – I observed 16 areas located outside that were discussed in the self-disclosure and/or had unknown materials handled/stored/spilled in them currently or in the past. Their locations are noted as Areas 1 through 16 on attachment 4C, page 1. The materials disposed/handled/stored/spilled in each area are listed on the inventory included as attachment 4C.

I listed 14 of these areas on the NOV for a hazardous waste determination to be made on the materials that had been, or was being, disposed/handled/stored/spilled in that area as follows:

- Seven areas were related to OC's disclosure and are discussed above in Section 4.4 – Area 1 (inventory item #1); Area 2 (inventory item #2); Area 3 (inventory item #3); Areas 4 and 5 (inventory item #4); Area 11 (inventory item #9); and Area 15 (inventory item #12).
- Seven areas had materials currently being stored or spills – Area 6 (inventory item #5); Area 7 (inventory item #6); Area 8 (inventory item #7); Areas 9 and 10 (inventory item #8); Area 12 (inventory item #10); and Area 13 (inventory item #11).

The remaining two areas, Areas 14 and 16, were not listed on the NOV. Area 14 was the old battery storage area discussed in waste stream #8. Area 16 consisted of piles of apparent dirt, gravel and concrete. They were believed to have been generated when a new building addition was added around 2011 and what the previous management brought from their farm. At the time of the inspection, the piles were believed not to be contaminated.

Also, in regards to any oil releases on-site, it should be noted that according to Title 126, Chapter 18, 001.01, no person shall release, cause to be released or allow the release of an oil or hazardous substance or residuary products thereof, into, or upon the waters or land of the state, except in quantities, and at times and locations, or under circumstances and conditions as the Department approves (25 gallons on the land and any amount to a waterway as noted).

In addition, I observed various other stains located inside and outside of the facility such as those shown in photos 31 and 74. As stated above in Section 4.1, Mr. Perkins stated that their current priorities include determining the corrective actions for the disclosure items.

4. Used oil, likely containing spent solvents, transported off-site for disposal as discussed in the disclosure (NOV #1(f)) – The type of oil/solvent waste shipped off-site was unknown as stated in Section 4.4.B.
5. Oil Related Wastes (Additional Information Needed) – As discussed above in waste stream #3, there was an analysis conducted on “oily sludge” that showed it to be non-hazardous and there were past shipments of oil related wastes off-site. However, it was unclear if an adequate hazardous waste determination had been made and which of the specific oil related waste streams were being shipped off-site and/or disposed on-site. Therefore, I asked for additional information regarding the shipments of hazardous waste and the analysis. This information was to include what waste stream the D008 shipment consisted of, how it relates to the non-hazardous oily sludge shipped off-site and how the sample was collected for the analysis.
6. Floor Sweepings (NOV #1(d)) – As discussed in waste stream #11, a hazardous waste determination had not been made on the floor sweepings.
7. PPE (NOV #1(e)) – As discussed in waste stream #12, a hazardous waste determination had not been made on the spent PPE.

4.5.2 Failing to Notify (Not listed on the NOV)

According to Title 128, Chapter 4, 003, a generator must submit a notification of hazardous waste activity to the Director. As discussed above in Section 4.2, since Mr. Williams was hired, OC had one hazardous waste shipment. It consisted of 4950 pounds of D008 hazardous waste on 11/13/2013. Since over 2200 pounds of hazardous waste was shipped off-site, it appears that OC should have notified as a small quantity generator (SQG) or large quantity generator (LQG) as applicable. OC had not notified until just recently.

4.5.3 Open Container of Universal Waste (Not Listed on the NOV)

According to Title 128, Chapter 25, 012.04A, containers of universal waste lamps must be closed. As discussed in waste stream #10, I observed a box of spent 8ft fluorescent lamps open. I discussed this with Mr. Williams and Mr. Perkins and they stated that it would be closed.

5.0. SUMMARY

At the time of the inspection, I determined that OC was an CESQG of known hazardous waste. However, additional hazardous waste determinations need to be made, as discussed above, that may affect the CESQG status determination. Other than the items noted above, I observed no other apparent violations. However, my findings may be reviewed further after the inspection that may change or add to my findings.

Dedriel Newsome

Dedriel L. Newsome

Environmental Engineer

Date: 4/21/14

Figures

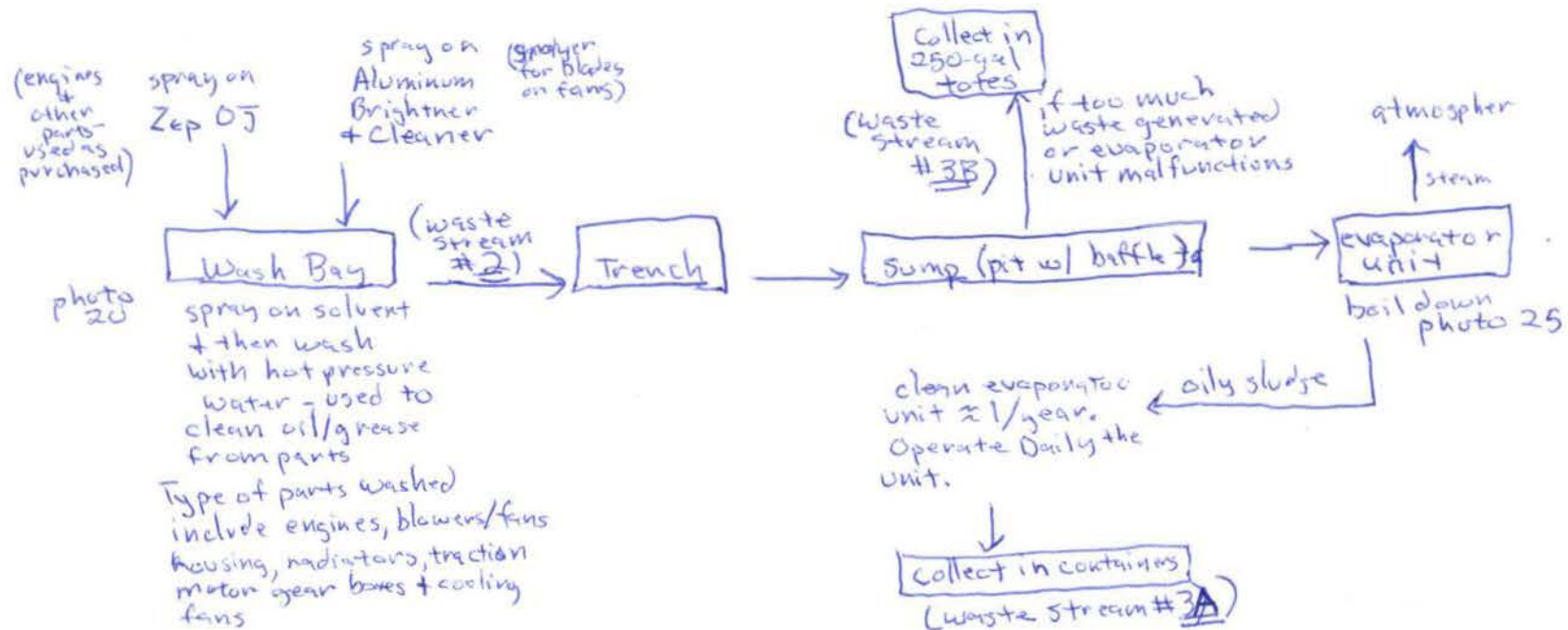
1. Wash Bay Process Diagram (1 page)

Attachments

1. Entry / Exit Checklist (2 pages)
2. Confidentiality Notice (1 page)
3. Receipt for Documents (1 page)
4. NOV (1 page)
 - A. NOV Attachment #1 (3 pages)
 - B. NOV Attachment #2 (7 pages)
 - C. NOV Attachment #3 (4 pages)
5. Documents Regarding the Uploading of Photos (2 pages)
6. Self-Disclosure Documents
 - A. 2/5/2014 OC Self disclosure Letter to EPA (12 pages)
 - B. Part of the 3/19/2014 OC Response to EPA Questions (106 pages)
7. Facility Location and Layouts
 - A. Aerial Photo (1 page)
 - B. Facility Layouts (2 pages)
8. Materials Requisition #50020 for 11/12/2013 Manifest Shipment (1 page)
9. Lead-Acid Batteries Off-site Shipping Documents (32 pages)
10. GPS Readings for the Areas Noted on Attachment 4C (1 page)

Photo Log (5 pages)

Photographs (21 pages/77 photos)



Omega Capital, Gering, NE
Figure 1: Wash Bay Process Diagram

3/25-26/14 RCRA Inspection
 D. Newsome

Facility: OmegaDate: 3/25/14Arrival time: 8am**DRIVE-BY**1. Drive-by conducted from public right-of-way? ☒ Yes ☐ No

Facility Orientation

Determine the direction "North" with respect to the facility and provide a brief sketch of the layout and orientation (as can be viewed from the public right-of-way): →

3. Obvious concerns visible from public right-of-way (photos)? ☐ Yes ☒ No

- | | | |
|-------------------|-----------------------|------------------------|
| - Containers | - Tanks | - Processing Equipment |
| - Loading Areas | - Unloading Areas | - Security Devices |
| - Open Drums | - Stressed Vegetation | - Unusual Staining |
| - Unusual Odors | - Obvious Discharges | - Improper Disposal |
| - Safety Concerns | - Other Concerns | |

SITE ENTRY AND INBRIEFING1. ☒ Used main entrance ☐ Entered during normal operating hours ☒ Excessive delays (>15 minutes - denial of access?) - ☐ No2. Facility Representative(s): see report Title: _____
Title: _____3. Does representative have intimate knowledge of all waste management practices? ☐ Yes ☐ No How long in position? see report**4. Introduction:**

- | | |
|---|---|
| <input type="checkbox"/> Presented credentials | <input type="checkbox"/> Explained responsibility to provide accurate information and provided copies of Section 1001 and 1002 U.S.C. to facility |
| <input checked="" type="checkbox"/> Verified presence at correct facility (checked address/I.D. #) | <input checked="" type="checkbox"/> Identified personal safety considerations: |
| <input checked="" type="checkbox"/> Explained authority to conduct inspection (Section 3007 of RCRA) | <input type="checkbox"/> Completed Multimedia screening checklist <u>fac closing</u> |
| <input checked="" type="checkbox"/> Explained the purpose, scope, and order of the inspection | <input checked="" type="checkbox"/> Provided SBREFA handout |
| <input checked="" type="checkbox"/> Explained documentation process - worksheets, checklists, photo's, notes, statements, etc | <input type="checkbox"/> Obtained GPS reading |
| <input type="checkbox"/> Explained facility's right to claim CBI | |

Was full access granted? ☐ Yes ☒ By facility representative Other (name): _____
announced (see report)
☐ No - Access denied Name of person denying access: _____ Time of denial: _____

Reason for denial, or limitations placed on access:

EXIT BRIEFING1. Reviewed all data collected and documented all concerns or violations? ☒ Yes ☐ No

- Location of the violation, type and amount of waste involved, time frame, frequency, specific dates & when first started occurred
- Illegal units - unit location (diagram/picture), dimensions, conditions, construction material, gradient of the base (for spills), other information.
- Illegal disposal - how, when (each occurrence), where sent or disposed of, how shipped, who shipped, when shipped/disposed of, quantity

☒ Identified/verified violations from previous inspection were corrected (if applicable)

- ☒
- Addressed all unresolved inspection related issues
-
- ☒
- Summarized findings and observations for the facility representatives

NOV issued? ☒ Yes ☐ No ☒ Violations clearly identified and explained, including: circumstances, location, and applicable regulations

- ☒
- Explained the importance of a timely (14 day) and adequate response
-
- ☒
- Explained that findings and observations are based on your current knowledge of RCRA and that the final findings may differ (Compliance Officer present)
-
- ☒
- Explained that compliance officer will make the final compliance decisions and that all compliance questions should be directed toward them
-
- ☒
- Explained that recommendations provided are for informational purposes only and
- DO NOT**
- require specific actions by the facility
-
- ☒
- Provided facility with CBI form
-
- ☒
- Prepared Document Receipt form

3. Specific information requested from facility? ☒ Yes ☐ No see report4. Facility appears to have awareness of RCRA regulations and/or has its own environmental staff? ☒ Yes ☐ No consultantFacility has copy of applicable regulations? internes ☒ Yes ☐ No6. Attitude and demeanor of facility representative(s): ☒ OK ☐ Not OK

Compliance Asst Doc Provided

EPA Compliance Assistance Ctrs

Industry Sector Notebook List

SAREFA

Homeland Security Handout

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CONFIDENTIALITY NOTICE

Facility Name <i>Omega Capital, LLC</i>	
Facility Address <i>130900 Lockwood Road, Gering, Nebraska 69341</i>	
Inspector (print) <i>Dedriel Newsome</i>	
U.S. EPA, Region VII, 901 N. 5th St., Kansas City, KS 66101 <i>300 Minnesota Avenue</i>	Date <i>3/25-26/2014</i>

The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR 2, Subpart B. The following criteria in Subpart B must be met:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. No statute specifically requires disclosure of the information.
3. Disclosure of the information would cause substantial harm to your company's competitive position.

Information that you claim confidential will be held as such pending a determination of applicability by EPA.

I have received this Notice and <u>DO NOT</u> want to make a claim of confidentiality at this time.	
Facility Representative Provided Notice (print) <i>[Signature]</i>	Signature/Date <i>3/26/14</i>

I have received this Notice and <u>DO</u> want to make a claim of confidentiality.	
Facility Representative Provided Notice (print)	Signature/Date

Information for which confidential treatment is requested:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RECEIPT FOR DOCUMENTS AND SAMPLES

Facility Name <u>Omega Capital, LLC</u>
Facility Address <u>130900 Lockwood Road, Gering, Nebraska 69341</u>

Documents Collected? YES X (list below) NO

Samples Collected? YES (list below) NO X Split Samples: YES NO

Documents/Samples were: 1) Received no charge X 2) Borrowed 3) Purchased

Amount Paid: \$ Method: Cash Voucher To Be Billed

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

Spent Lead Acid Battery Shipping Documents (02/01/2013, 02/26/2013,
03/21/2013, 04/09/2013, 05/07/2013, 05/29/2013, 07/27/2013, 09/29/2013,
10/08/2013, 10/21/2013, 12/20/2013, 12/27/2013, 01/20/2014) - 27 pages
Safety - Kleen letter hand dated 9-17-2013 - 2 pages
Facility Diagram - 1 page
Spent Lead Acid Battery Shipping Documents dated 01-24-2014 - 4 pages
Facility Diagram showing workstations - 1 page
11/13/13 Manifest (2 pages)
11/12/13 Material Requisition (1 page)

Additional Info:

- Clarification on 11/13/13 D008 manifest shipment (what waste did
this consist of + how it relates to the non-hazardous oily
waste/sludge); Also how sampled for non-haz ^{ESC} analyses 11/28/12
of oily waste sludge profile.

Facility Representative (print) <u>Doug [Signature]</u>	Signature/Date <u>3/26/14</u>
Inspector (print) <u>Dedriel Newsome</u>	Signature/Date <u>Dedriel Newsome 3/26/14</u>
U.S. EPA, Region VII, 901 N. 5th Street, Kansas City, KS 66101	

(rev:1/20/93)

Notice of Violation Pursuant to Requirements
of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: Omega Capital, LLC
Address: 130900 Lockwood Road
Gering, Nebraska 69341
EPA ID Number: Non-Notifier Date: 3/25-26/14

This notice is provided to call your attention to the following areas of noncompliance with state and federal regulations. This notice does not constitute a compliance order (Administrative Civil Complaint) pursuant to Section 3008 of RCRA and may not be a complete listing of all violations resulting from the the inspection.

Citation

as incorporated
in NE State
regs

Description of Violation

① Title 128, Ch 4,002

Failing to make a hazardous waste determination on

(a) Attachment 1 (3 pages)

(b) Attachment 2 (7 pages)

(c) Attachment 3 (4 pages)

(d) Floor Sweepings

(e) PPE disposed

(f) Waste taken to farms

(Please note text in brackets + black ink written after
inspection on NOV attachments 1 thru 3)

DIN 4/16/14

You are requested to submit a written response within **14 calendar days** of receipt of this notice. Your response should include a description of all corrective actions taken and/or a schedule for completing the necessary corrective actions. The response should be submitted to:

U. S. Environmental Protection Agency, Region VII

300 Minnesota Avenue
Kansas City, Kansas 66101

ATTN: Dedriel Newsome

If you have any questions about this Notice or wish to discuss your response, you may call me at

(913) 551-7049

, or

Kevin D. Snowden

(Compliance Officer) at

(913) 551-7022

This Notice prepared by

Dedriel Newsome

Date:

3/26/14

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name:

Doug Williams

Date:

3/26/14

Signature:

Doug Williams

Title:

General Manager

[Photos 28-31, 38+39]

Hazardous Waste

Storage Area
(All drums full unless noted differently)

- [Row 1]
- 1 Induso Degreaser - 55-gallon drum dated 3/3/2014 (1st row)
[contain $\approx 1/5$ gallons]
 - 2 Unknown - 55-gallon drum on side found outside, dated 3/3/2014
the drum was bulging (1st row)
- [Row 2]
- 3 Zep Dyna 143 (used) - (2) 30-gallon drums dated 3/3/2014 (1st row)
 - 4 Oily Sludge - 55-gallon drum from 3/11/2014 spill, dated 3/11/2014
(second row)
 - 5 Oily Sand - 55-gallon drum from Blaster Area, dated 3/3/2014 (2nd row)
 - 6 Oily Sludge/Solid Waste - 55-gallon drum from 3/11/2014 spill, dated 3/11/2014 (2nd row)
($\approx 2/3$ full)
 - 7 Oily Sludge - 55-gallon drum from 3/11/2014 spill, dated 3/11/2014 (2nd row)
($\approx 1/3$ full)
 - 8 Unknown - 55-gallon drum with yellow hazardous waste label, dated 3/3/2014 (2nd row)
[had a Haz Waste label]
Tec 41 506 Rust Prevent
but says not sure if what says yellow
 - 9 Unknown - 5-gallon pail with hazardous label, also labeled xylene, dated 3/3/2014 (2nd row)
(contain ≈ 1 "") [had a Haz Waste label]
xylene, says not sure what says
 - 10 Oily Water from Evaporator Spill - 55-gallon drum, dated 3/11/2014 (2nd row)
(Condition - dented bottom rim)
 - 11 Oily Water from Evaporator Spill - 55-gallon drum, dated 3/11/2014 (2nd row)
($\approx 4/3$ full)
 - 12 Oily Sludge/Solid Waste - 55-gallon drum from 3/11/2014 Evaporator Spill, dated 3/11/2014 (2nd row)
($\approx 1/3$ full)
 - 13 Oily Sludge/Solid Waste - 55-gallon drum from 3/11/2014 Evaporator Spill, dated 3/11/2014 (2nd row)
($\approx 2/3$ full)

Hazardous Waste Storage Area

- 14 Oily Sludge/Solid Waste - 55-gallon drum from 3/11/2014 Evaporator Spill, dated 3/11/2014 (2nd row)
($\approx 2/3$ full)
- 15 Oily Sludge/Solid Waste - 55-gallon drum from 3/11/2014 Evaporator Spill, dated 3/11/2014 (2nd row)
- 16 Oily Sludge/Solid Waste - 55-gallon drum from 3/11/2014 Evaporator Spill, dated 3/11/2014 (2nd row)
($\approx 2/3$ full)
- 17 Oily Sludge/Solid Waste - 55-gallon drum from 3/11/2014 Evaporator Spill, dated 3/11/2014 (2nd row)
($\approx 1/3$ full)
- [Row 3] 18 Waste Paint - 55-gallon drum of waste paint from aerosol paint cans dated 3/3/2014 (3rd row)
($\approx 1/2$ full)
- NH 19 Punctured Paint Cans - 55-gallon drum of ^{punctured} aerosol paint cans, nonhazardous waste, dated 3/3/2014 (3rd row)
- 20 Used Oil - 55-gallon drum, dated 3/3/2014 (3rd row)
($\approx 1/6$ full)
- 21 Solvent 140 - 55-gallon drum that was not "virgin", dated 3/3/2014 (3rd row)
($\approx 1/6$ full)
- 22 Lead Acid Battery (3rd row)
- 23 Filter Bag Residue - approximately 1.5 gallons (3rd row)
- 24 Plastic Bag containing 2-3 gallons of very fine sand found by sand blaster polisher (3rd row)
- 25 Lapping Paste - 30 - gallon drum dated 3/3/2014 (3rd row)

Hazardous Waste Storage Area

[row 4] 26 Texaco Thredtex - (14), 46-pound cans (4th row)

27 Evaporator Waste - ~~55~~⁴⁰⁺² gallon drum, dated 3/3/2014 (4th row)

28 Used Oil - 250-gallon tote, dated 3/3/2014 (4th row)

29 Used Oil - 250-gallon tote, dated 3/3/2014 (4th row)
(^{contains} ~~200~~ gallons)

30 Evaporator Waste - 250-gallon tote, dated 3/3/2014 (4th row)
~~200 gal~~

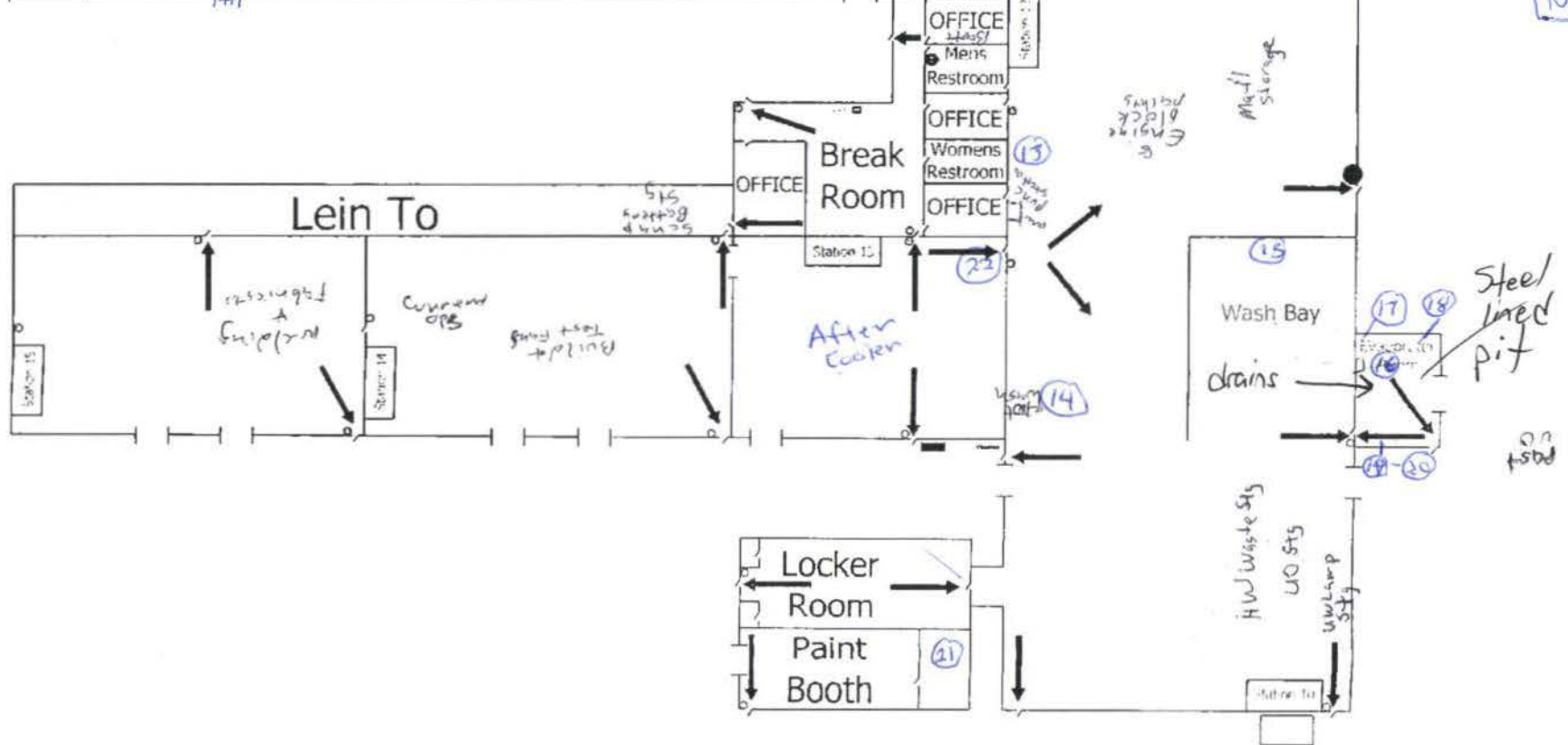
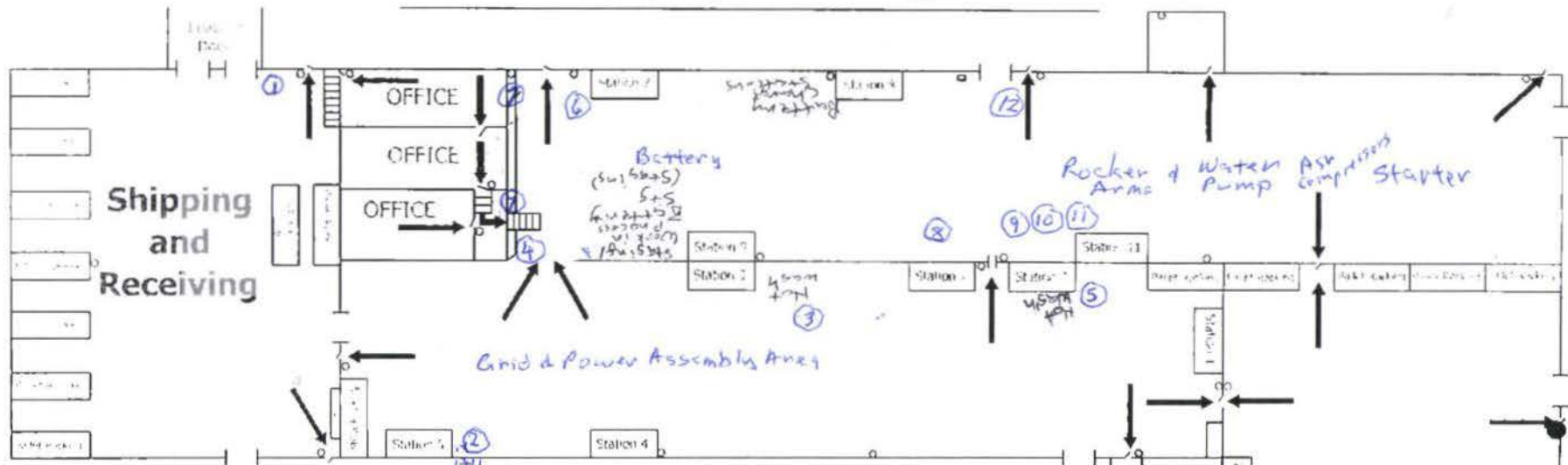
31 Evaporator Waste - 250-gallon tote, dated 3/3/2014 (4th row)

32 Evaporator Waste - 250-gallon tote, dated 3/3/2014 (4th row)

[Against wall near UV lamps] 33 Oils - 10, 5-gallon pails in corner of room
some partially full & some full

~~34 Lamps -~~

Employee Parking



- Eye Wash Station
- Shower
- Fire Extinguisher (+) Number
- Electrical Disconnect
- Natural Gas Disconnect
- Water Disconnect
- Primary Exit
- Secondary Exit

NOV Attachment #2

Initial
Date
Rev 3/26/14
Rev 3/26/14

#	LOCATION	QTY	WASTE DESCRIPTION (name, how generated, where came from, why put there, intent, etc.)	HAZ. WASTE DETERMINATION	STORAGE START DATE	PHOTO #
1	Shipping & Receiving Wood Cabinets	→	<p>≈ 30 aerosols</p> <p>≈ 7, 1gal containers</p> <p>Scavenging</p> <p>Facility shutting down -</p> <p>Need to determine if a waste or it can be used</p>	Not Made	<p>prior to July 2013</p> <p>Not Used by DW [DW = Doug Williams]</p>	37
2	Grind Area/Power Assembly	1 - 230gal drum ≈ 2/3 full	Drum connected to dust collector on a sandblast cabinet. It was last used mid Jan 2014. No labels	Not Made	last used mid Jan 2014	1
3	#1	<p>3/4 full 5gal pail</p> <p>3/4 " " "</p> <p>+ ≈ 1gal on floor in pile</p>	<p>Residue from cylinder head on power assembly line. Used to remove carbon build up / oil residue.</p> <p>Blasting media used is aluminum oxide</p> <p>No labels / open pails</p>	Not Made	<p>prior to July 2013</p> <p>Not Used by DW</p>	2 + 3
4	11	<p>≈ 60 aerosol cans</p> <p>3, 1-gallon</p> <p>+ 2, 1-gt</p> <p>Already inv</p>	<p>aerosol paints + cans of paints and other chemicals in flammable cabinet</p> <p>Facility shutting down -</p> <p>Need to determine if a waste or it can be used</p>	Not Made	11	5

#	LOCATION	QTY	WASTE DESCRIPTION (name, how generated, where came from, why put there, intent, etc.)	HAZ. WASTE DETERMINATION	STORAGE START DATE	PHOTO #
5	Grnd Area/ Power Assembly	2 10-15 gal inside unit 2 1/2 full 5 gal pail	old ^{green} parts washer unit with soln remaining and pail located near it (open, no label)	Not Made	prior to July 2013 Not Used by DW [DW = Doug Williams]	6-8
6	Battery Charging Area	1 filter 18" x 18" 4 filters 3' x 18" 1 foam sheet	small aerosol paint booth with one 18" x 18" filter in ceiling Use Krylon ^{aerosols} paints in booth used filters of unknown use found on site " " " 24" x 24"	Not Made	prior to July 2013 Not used by DW	9- [12]
7	Refrigerator Overhaul Room	11 20 lb cylinders 2 20 lb " 1, 93.5 lb 1, 93.5 lb	R22 R134a Burnt Freon Mixed Freon (Need to determine if empty)	Not Made	prior to July 2013	10 11
8	Battery Charging Area	unknown qty 5 gal pail 2 1/4 full	In lapping unit not used on top of lapping unit	Not Made	prior to July 2013	14

#	LOCATION	QTY	WASTE DESCRIPTION (name, how generated, where came from, why put there, intent, etc.)	HAZ. WASTE DETERMINATION	STORAGE START DATE	PHOTO #
9	Rocker Arm/ Water Pump	unknown qty in unit + 2 1/2 full 5 gal pail	Sand blaster cabinet.	Not made	prior to July 2013	15
10	"	unknown ____ full ____ (calc)	3 parts washer units disconnected blue unit + 1 filter red unit (3' x 18" with 2" soln) Blue/red unit (3' x 18" with 6" soln) Not sure type of solvent used in each	Not Made	prior to July 2013	16
11	"	225 to 300 gal	Water Pump Pressure Testing fluid (light red color) with Rust Inhibitor [in tank]	Not Made	prior to July 2013	17
12	"	25 to 10 gal	White polishing media left in the Almco Vibrator Finishing machine used to clean pins on rocker (maybe returned to customer)	Not Made	prior to July 2013	No photo

#	LOCATION	QTY	WASTE DESCRIPTION (name, how generated, where came from, why put there, intent, etc.)	HAZ. WASTE DETERMINATION	STORAGE START DATE	PHOTO #
13	Engine Work Area	<p>≈ 20 ≈ 18, 1gal cans ≈ 4, " " 1, 5gal pail Already inv</p>	<p>Flammable Cabinet Aerosol cans of paints & other chemicals cans of paints " " " " " "</p>	Not Made	prior to July 2013	18
14	"	Unknown	<p>Large Parts Washer light green unit believe just water Proceco Typhoon soln left in unit</p>	Not Made	<p>prior to July 2013 [was used after DW]</p>	19
15	Wash Bay	<p>2, 1/2 full 5gal pail ≈ 4" — 3 containment pans — 5' x 5' x 8" — gear oil from traction motor will put in a 250gal UO tote ≈ 2" to 3" of soln — 6' x 3' x 6" with oily — plan to put in oily water tote ≈ 1" — 6' x 3' x 6" — solid residue will collect with oil dry for sampling } will collect together ≈ 1" — 20' x 1' x 4" deep with ≈ 1" residue in trench</p>	<p>3 containment pans oily water — 5' x 5' x 8" — gear oil from traction motor will put in a 250gal UO tote — 6' x 3' x 6" with oily — plan to put in oily water tote — 6' x 3' x 6" — solid residue will collect with oil dry for sampling } will collect together — 20' x 1' x 4" deep with ≈ 1" residue in trench</p>	Not Made	prior to July 2013	<p>20-22 26 22 21</p>
16	Evaporator Pit Room	<p>≈ 100 gal ≈ 18"</p>	<p>Evaporator - 150 gal capacity with ≈ 100 gal soln consisting of oily water & oily sludge [sloped] Evaporator pit (5 to 4' deep x 8' x 4') with ≈ 18" soln oily water & sludge</p>	Not Made	prior to July 2013	<p>25 26 [27]</p>

#	LOCATION	QTY	WASTE DESCRIPTION (name, how generated, where came from, why put there, intent, etc.)	HAZ. WASTE DETERMINATION	STORAGE START DATE	PHOTO #
17	Evaporator/ pit Room	unknown	Hotly Washer left over soln	Not Made	prior to 2013 July	25
18	11	unknown	55gal drum of solvent 140	Not Made	prior to July 2013	26
19	11	30 230 9 3 1 (24 can) + box 2 (4 can boxes)	Flammable Cabinet #1 aerosol cans 1gal cans 5gal pails aerosol cans [paints, etc.]	11	11	24
20	11	230 4 2	Flammable Cabinet #2 aerosol cans 1gal cans 5gal pails [paints, etc.]	11	11	23

→ Flammable Cabinet #3 in-wall
 2 cans paint & caulking

no
photo

#	LOCATION	QTY	WASTE DESCRIPTION (name, how generated, where came from, why put there, intent, etc.)	HAZ. WASTE DETERMINATION	STORAGE START DATE	PHOTO #
21	Old Paint Booth Storage Room	27, 5-gallon 13, 1-gallon 24, aerosol spray Cans	Paint-related materials	Not made	Prior to July 2013 Not used by DW	33 34 35
22	After Cooler Room Flammable Cabinet	50, aerosol spray cans 2, 5-gallon 7, 1-gallon	Paint-related materials, one, 5 gallon Container of Xylene	Not Made	Prior to July 2013 #	36



[Area #s]
[Area A, like Area 14 - see waste stream #2]

Initial + Date
DN 3/26/14
DN 3/26/14

#	LOCATION	QTY	WASTE DESCRIPTION (name, how generated, where came from, why put there, intent, etc.)	HAZ. WASTE DETERMINATION	STORAGE START DATE	PHOTO #
1	South Side of site (Area 1)	unknown	^{Suspected} Waste disposed in pit covered with soil + broken concrete [dark stain soil, rag in area. ^{hole that was dug} $\approx 10'$ D x 8' Deep] [piles on top $\approx 50'$ Diameter up to 4ft High]	Not Made	ceased no later than 7/8/13 believed may excavated ≈ 2011	40-44 [45]
2	South Side of site (Area 2)	unknown	3 piles southeast of above pit area (Believed may have been dug from above pit area) ($\approx 10'$ D x 6' H; 8' D x 6' H; + 8' D x 4' H)	Not Made	11	45-46 [47]
3	South West Side of Site (Area 3)	unknown	Suspected used oil mixture disposal area - Black stains in area ($\approx 15'$ ft x 4' ft)	Not Made less	last used \approx Jan 2013	47-49 [50] close-up
4	Old Stg Area Pad (Area 4) + 5	6' x 6' x 3' [tank size] 6' x 6' x 6' [capacity] 10' x 20' x apto 2' H	UST - waste in tank $\approx 6'$ x 6' x 3' of solution [believed connected to adjacent storage pad + acts as waste drained on ground [suspected area] containment sump] Residue on storage containment pad with ^{dark} apparent stains Had some open drums of oily waste store on pad [when DW was hired] Removed drums + totes inside [Aug + Dec 2013]	Not Made	Remove drums + totes to inside \approx Aug 2013 \approx Feb 2013 possible for last draining of waste on ground	51-53 Area 4 54-59 Area 5

[Total Area $\approx 50'$ x $50'$]

#	LOCATION	QTY	WASTE DESCRIPTION (name, how generated, where came from, why put there, intent, etc.)	HAZ. WASTE DETERMINATION	STORAGE START DATE	PHOTO #
5	Southwest Side of Site (Area 6)	20' x 6'	^{Unknown} Dark stain - been there since D. Williams started. (Had petroleum odor)	Not Made	prior to July 2013	60 + 61
6	Southwest Side of Site (Area 7)	20' x 2'	^{Unknown} Dark stain - been there since D. Williams started	Not Made	" "	62
7	^{South} West Side of Site (Area 8)	~ full 5-gal pail	Unknown pail with no labels, no label & rusty	Not Made	" "	63
8	South West Side of Site (Area 9) + 10	13 lamps in casing + 1 loose bulb (Area 9) Area 10 Trailer on North Side	- Unknown type of lamps labeled GE R175 Mercury 110V 5A - " " " " - 3, 8ft fluorescent lamps	Not Made	" "	64-66 67 + 68 -

#	LOCATION	QTY	WASTE DESCRIPTION (name, how generated, where came from, why put there, intent, etc.)	HAZ. WASTE DETERMINATION	STORAGE START DATE	PHOTO #
9	South Side (Area 11)	unknown	3/11/14 Spill area (evap pit overflowed) 3 puddles cleaned up next day on 3/12/14 + put in drums later → Haz Wst Storage Area	Not Made	3/11/14	69
10	South Side Storage Containment Area (Area 12)	10' x 3'	Dark stain in containment area ≈ 10' x 3'	Not Made	prior to 7/13	70
11	Southwest Side (Area 13)	see next column	Old Sandblast Area outside pile near building ≈ 10'D x 8"H pile near fence ≈ 40' x 6' x 2' High [cracks observed in concrete]	Not Made	prior to 7/13 (last used ≈ Jan 2011)	71 + 72 + 73 [74]
12	North Side of site (Area 15)	50' Unknown	Waste drained from batteries on 50' x 50' area	Not Made	prior to 7/13	76 + 77

Newsome, Dedriel

From: Scott Perkins [sperkins@faulknerflynn.com]
Sent: Tuesday, April 01, 2014 1:43 PM
To: Newsome, Dedriel
Subject: Omega Photos

Dedriel,

I enjoyed walking the fields of Nebraska with you. We discussed uploading your photos to our virtual data room. I know you have a lot of photos so instead of loading them all individually, you can zip them or put them in a pdf or whatever's easiest. If you can consolidate them, then you can go to:

Web Site Address - <http://www.f2-transaction.com/>

Username - **dedrielnewsome**

Password - **[REDACTED]**

Click Omega, then pick the sub-topic Omega and click Photos then click "Upload File". Call the file whatever you like, pick whatever category/date you want and just let me know when you've uploaded them. I can walk you through it if you prefer. If this won't work could you please email me Photo #70 and then either email in batches or send a cd.

Regards,

Scott

Scott Perkins, P.E., Senior Consultant

Faulkner & Flynn, Inc. | 101 S. Jefferson St., The Liberty Trust Building | Roanoke, VA 24011

P: (540) 767-4153 | F: (540) 985-9538 | C: (540) 293-0101

scott.perkins@faulknerflynn.com | www.faulknerflynn.com

Omega - Upload File - Dedriel Newsome - Windows Internet Explorer

http://www.f2-transaction.com/upload.aspx?structid=372&facility=Photos

FAULKNER & FLYNN

ENVIRONMENTAL MANAGEMENT CONSULTANTS

Omega Upload

Document Type: (Defined List)
Due Diligence

Facility: (Defined List)
Photos

Document Name/Title: (Text)
3/25-26/14 Omega RCRA

Document Date: (Date)
3/25-26/14

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DANIEL C. SUMMERLIN
(540) 983-7546
summerlin@woodsrogers.com

February 5, 2014

VIA E-MAIL AND REGULAR MAIL

Julie Murray, Esq.
US EPA Region 7
Mail Code CNSL
901 North Fifth St., Room 2265
Kansas City, KS 66101

**Re: Self Disclosure Pursuant to EPA Audit Policy – Omega Capital, Gering,
Nebraska**

Dear Ms. Murray:

We have been retained by Omega Capital, LLC, a Virginia limited liability company ("Omega"), to represent its interests in this matter. By and through its counsel, Omega respectfully submits this self-disclosure pursuant to EPA's "Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations" ("Audit Policy") (60 Fed. Reg. 66706 (Dec. 22, 1995)).

As is more fully discussed in the attached questionnaire (utilizing the EPA suggested format), this disclosure concerns historical waste-disposal activities at Omega's facility located at 130900 Lockwood Road, Gering, Nebraska. Omega became first aware of a potential issue on or about January 9, 2014, and retained Woods Rogers to investigate. On January 27-29, Woods Rogers and its investigator (a retired Nebraska law enforcement officer) interviewed current and former employees, reviewed documents, and inspected the Lockwood Road facility. Woods Rogers verbally reported its findings to the governing Board of Omega's parent entity, ATR Investments, LLC, on January 30, 2014. The potential violations relate to the disposal of used oil and the liquid contents of locomotive batteries. Specifically, used oil, likely containing spent solvents, was deposited directly onto the ground in various locations at the Lockwood Road facility and one offsite location (the former general manager's farm). It also appears that a pit was excavated approximately three to four years ago and some waste material—likely used-oil or used-oil contaminated soil—was placed in the pit that was then filled with soil and broken concrete. Finally, the liquid contents of the locomotive batteries were reportedly allowed to drain directly onto the property.

According to the current and former employees who were interviewed as part of our recent investigation, these actions were performed and subsequently concealed primarily at the direction of two individuals (Roger and Allen Beitel), who are no longer employed by Omega. It is believed that this practice occurred intermittently over the course of several years, ending in or about May 2013. In no event, did the violations occur past the date of the Beitel's termination on

{#1664619-1, 038567-00008-03}

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www.woodsrogers.com

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Julie Murray
February 5, 2014
Page 2

July 8, 2013. To assist in understanding the context of this disclosure and the accompanying report, it is necessary to provide some background on the operations at Omega's facility, recent corporate changes, and the individuals involved.

Omega is engaged in the business of offering locomotive repair, overhaul, fabrication and related services and providing locomotive components, including, but not limited to, new locomotive components and reconditioned core components. Omega has a single facility located in Gering, Nebraska, and currently has 31 employees.

Until 2010, Omega was a family business-owned and operated solely by the Beitel family through two related entities, Advanced Technology Repair, Inc., a Nebraska corporation (hereinafter "Old ATR"), and Omega Capital, L.L.C., a Nebraska limited-liability company (hereinafter "Old Omega"). Graham-White Manufacturing Co. ("GW"), a Virginia corporation, had no direct or indirect involvement or interest in the Omega business until May 1, 2010, when GW and the Beitel family entered into a series of transactions after which (i) Roger Beitel, Allen Beitel and Shawna Payne (Roger Beitel's daughter) were the sole owners of a newly formed Nebraska corporation named Beitel Holdings, Inc. (hereinafter "Beitel Holdings"), (ii) Beitel Holdings and GW were the sole owners of a newly formed Virginia limited liability company named ATR Investments, LLC (hereinafter "ATR Investments"), which was owned 60% by GW and 40% by Beitel Holdings, (iii) ATR Investments was the sole owner of Advanced Technology Repair, LLC (hereinafter "ATR") and Omega, each of which was a newly formed Virginia limited liability company, (iv) Omega held all of the assets that had been previously owned by Old Omega, and (v) ATR held all of the assets previously held by Old ATR (collectively, (i) through (v) shall be referred to herein as the "Transaction"). Over time subsequent to the date of the Transaction, ATR effectively discontinued its day-to-day operations, which were all transitioned to Omega. However, at all times from the date of the Transaction to the date on which their employment was terminated (July 8, 2013), Roger Beitel and Allen Beitel managed and controlled the day-to-day affairs of ATR Investments, ATR, and Omega.

It is also important to note that prior to purchasing its stake in ATR Investments, GW had a Phase I study done on the Omega facility in accordance with ASTM Practice E-1527-05. No issues related to the disposal of wastes were identified in the report. Moreover, as required, the consultant who prepared the report interviewed Roger Beitel and asked about any known environmental conditions. In response, "Beitel stated that he is unaware of any current environmental issues or concerns in connection with this property...." Based upon the recent investigation, this appears to be an inaccurate statement and one designed to mislead the consultant and GW. The recent investigation also revealed that around the time of GW's purchase, a large pit was excavated and some waste was deposited in the pit and covered with soil and broken concrete. It is believed that this was a further attempt by the Beitel family to mislead GW into believing there were no environmental issues on the property.

In addition to obtaining a Phase I study as a condition to GW's investment in ATR Investments, GW required that Beitel Holdings, Roger Beitel, Allen Beitel, and Shawna Payne

{#1664619-1, 038567-00008-03}

Julie Murray
February 5, 2014
Page 3

provide representations and warranties that the Omega and ATR businesses had been operated in compliance with all environmental laws, and that they were not aware of any environmental issues on the properties on which the businesses were conducted.

In late 2011, an additional Phase 1 study was conducted on the property in connection with the acquisition of GW by Faiveley Transport USA, Inc. This study also revealed no issues with respect to the improper disposal of wastes.

In June 2013, GW received a letter from a current Omega employee complaining about Roger Beitel's conduct. In sum, this employee alleged that Roger Beitel, as company president, verbally abused Omega employees and otherwise had created a hostile work environment and, engaged in various acts of malfeasance. GW's director of human resources immediately investigated the allegations raised in the employee's letter. After speaking with several Omega employees, the director of human resources confirmed that Roger Beitel had created and perpetuated a hostile-work environment and likely engaged in various acts of malfeasance.

On June 27, 2013, the Board of Directors of ATR Investments promptly voted to terminate Roger Beitel's employment and the employment of Roger Beitel's son, Allen Beitel, and Roger Beitel's daughter, Shawna Payne. The Board also removed Roger Beitel from ATR's board. Their employment was formally terminated on July 8, 2013, once the Board of ATR Investments had made appropriate arrangements to secure the Omega facility and for interim management of the Omega business. As of the date hereof, Beitel Holdings continues to hold a 40% interest in ATR Investments and we believe that Roger Beitel and Allen Beitel continue to hold ownership interests in Beitel Holdings.

Once the Beitels were terminated in July 2013, ATR Investments engaged Doug Williams to manage the Omega facility. The immediate concern upon his arrival on site in July was the Beitel's financial malfeasance and its impact on Omega's operations and its customers. ATR Investments conducted a more thorough internal investigation in September 2013, which substantiated the previous findings. Through verbal discussions and a letter dated September 27, 2013, ATR Investments reported its findings of misconduct by the Beitel's to the Nebraska Attorney General's office. (A copy of the letter is attached hereto.) The Attorney General's office subsequently referred this matter to Scotts Bluff County Attorney Doug Warner and the Nebraska State Patrol for investigation and potential prosecution of the Beitel's. That investigation is currently ongoing, and ATR Investments and Omega are fully cooperating with these agencies.

Mr. Williams, Omega's new general manager, was not aware of any issues related to past waste-disposal practices prior to January 2014. Understandably, Mr. Williams was focused on the Beitel's financial and other misconduct, and there was initially nothing to suggest to Mr. Williams that the Beitel's had also improperly disposed of used oil and battery contents. As more fully discussed on the attached questionnaire, it was not until Williams overheard an employee joking about potential contamination on or about January 9, 2014, that he had any reason to

Julie Murray
February 5, 2014
Page 4

suspect that the Beitel's had also engaged in environmental misconduct. As soon as Mr. Williams learned of the possibility of improper waste disposal by the Beitel's, he alerted the directors of ATR Investments, who immediately ordered the most-recent internal investigation and the instant disclosure.

As the foregoing demonstrates, ATR Investments and GW were grossly misled by Roger Beitel both before the purchase of the ATR and Omega businesses in 2010 and afterwards while Mr. Beitel served as the general manager of Omega. The Beitel's have left a path of destruction, but Omega and ATR Investments are committed to cooperating in the ensuing investigation.

By copy of this letter (with attachment), this report is being made simultaneously to the Nebraska DEQ for consideration under their audit self-disclosure policy. We are also providing a copy to Scotts Bluff County Attorney Doug Warner, who is currently conducting the criminal investigation of the Beitel's.

Respectfully yours,

WOODS ROGERS PLC



Daniel C. Summerlin

cc: Alyse Stoy, Associate Deputy Regional Counsel for Enforcement
Nebraska Department of Environmental Quality
Douglas Warner, Scotts Bluff County Attorney

SELF-DISCLOSURE QUESTIONNAIRE RESPONSES

Re: Omega Capital, LLC, Gering, Nebraska

1. Describe the violation and state the specific regulatory or statutory provision violated.

Omega is engaged in the business of locomotive repair, overhaul, fabrication and related services and providing locomotive components, including, but not limited to, new locomotive components and reconditioned core components. As part of their process, locomotive components are pressure washed with water and a combination of solvents. The waste water and engine oil drain into an evaporator pit. When this evaporator malfunctioned or when operations produced more oil that could be burned, Roger Beitel and/or his son Allen Beitel would order the oil to be pumped out of the pit into 250-gallon totes. Those totes were then taken out the back door approximately 100 yards from the engine shop and drained onto the ground. It also appears that around the time of GW's purchase, through a majority owned subsidiary, of 60% of the business, that a hole near the south property line was excavated and that some unknown wastes may have been placed in the pit and covered with soil and pieces of broken cement. Finally, there is reason to believe that on one or more occasions a truck-load of totes containing used oil was transported from Omega's facility to the Beitel's farm. It is not known how they were ultimately disposed of at the farm. Because no sampling has been performed at any of the three locations it is difficult to ascertain the exact regulations that were violated.

The facility also refurbishes and recharges locomotive batteries. As part of the battery refurbishing process, the liquids and electrolytes would need to be drained. Allen Beitel regularly directed at least one employee to take batteries outside, punch holes in the bottom, and allow the water and other liquids in the batteries to drain out onto the ground. Because no sampling has been performed it is difficult to ascertain the precise regulations that were violated but it is anticipated that a violation of 42 U.S.C § 6925 exists.

2. Explain how the violation was discovered. Please be as detailed as possible.

The violations occurred exclusively under the management, direction, and supervision of Roger Beitel and Allen Beitel, as well as a former supervisor, Matt McKonkey, who left Omega in or about April 2013. The violations were discovered only after the Beitel's were terminated for abusive behavior and malfeasance, including theft and embezzlement. On or about January 9, 2014, the interim manager Doug Williams overheard an Omega employee joking about the quality of the ground water on the property. Upon hearing this, Mr. Williams questioned this employee regarding the meaning of his statement. Mr. Williams was told that used oil was dumped on the south side of the property. Mr. Williams talked to at least two other employees to determine whether there was any credible evidence to support the initial statement about the water. On January 15, 2014, Mr. Williams completed those informal interviews and alerted the Board of ATR Investments about the potential violations. ATR Investments retained the law firm of Woods Rogers, PLC, who had previously conducted an investigation related to other malfeasance by the Beitel's, to further investigate the new environmental concerns. On January 27-29, 2014, Woods Rogers along with its investigator interviewed numerous current and former Omega employees, reviewed documents and otherwise viewed the site. These interviews

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substantiated the noted concerns of contamination. An environmental consultant with extensive experience in RCRA waste issues was retained on January 28, 2014. An oral report was made to the Board of ATR Investments on January 30, 2014, and this report immediately followed. As of the date of this report no testing or sampling has been done to confirm the employee accounts of historical dumping. Omega has retained a consultant to assist it in developing the appropriate testing and sampling needed to determine the extent of the contamination. It is the intention of Omega to develop this plan working in conjunction with EPA and Nebraska DEQ.

3. State whether the violation of a federal, state, or local regulation was discovered by means of a systematic, internal, environmental audit or through a compliance management system.

No formal compliance management system as defined in EPA's Audit policy existed at the time.

4. Was the violation identified through an activity which Company was legally required to perform, such as under a State or Federal statute, regulation or permit, or under the terms of a judicial or administrative order or consent agreement? If so, identify the authority under which the activity was required.

The violations were not identified through an activity required to be performed under any State or Federal statute, regulation, or permit.

5. Is the violation required to be reported under any Federal or State statute, regulation or permit? If so, identify each such statute, regulation or permit.

At this time, we are not aware of any statute, regulation or permit requiring the violations to be reported.

6. State the date on which the violation was discovered. If Company believed additional analysis or information was needed after the audit/systematic procedure or practice to determine whether a violation existed, state the reasons for the additional analysis.

The first indication of any issue was on or about January 9, 2014 when the interim general manager Doug Williams overheard some employees discussing potential containments on the south side of the property. Mr. Williams promptly began interviewing employees to try to determine the issues. Approximately a week later, Mr. Williams concluded those interviews. At that time, he had reason to believe that improper disposal had occurred prior to his arrival, and he alerted ATR's Investment Board on or about January 15, 2014. The law firm of Woods Rogers was retained to further investigate the potential issues and to determine if there were any violations of applicable regulations. With the assistance of an investigator and Mr. Williams, Woods Rogers conducted interviews, reviewed relevant records, and toured the facility on January 27-29, 2014. Upon the conclusion of those interviews Woods Rogers orally reported its findings to the ATR Investments Board on January 30, 2014. By that time, Omega had an objectively reasonable basis for believing that a violation had occurred despite the lack of confirmatory sampling although specific details regarding such violations have not yet been determined.

7. If disclosure of the violation was not within twenty-one days of the date of discovery, or such shorter period as may be provided by law, please explain, in detail, the reasons that the violation was not disclosed within ten days of discovery.

Disclosure was made within the twenty-one days.

8. Identify the name, title, and employer of each individual who discovered the violation.

Doug Williams, interim General Manager of Omega Capital, first learned of the potential violations and alerted the ATR Investments Board to those potential issues.

9. If the violation was discovered by an independent auditor, (that is, by a person not employed by *Company*), provide the date and the manner in which *Company* was made aware of the violation.

Earlier concerns by Doug Williams were referred to the firm of Woods Rogers who investigated and confirmed those concerns. Woods Rogers provided a verbal report to ATR Investments Board on January 30, 2014.

10. Explain in detail all measures taken to correct or remediate the violation. Provide an estimate of the length of time it took or will take to complete these measures. If *Company* estimates that more than 60 days will be needed to correct the violation, please explain fully and provide the opinion of any technical or engineering expert relied upon to arrive at that estimate.

The past disposal practices ceased no later than July 8, 2013, but likely prior to that. All battery storage and used oil storage has been relocated indoors in an appropriate area. Moreover, Omega now contracts with Safety-Kleen to properly dispose of oil waste. Employees have been trained on proper disposal methods.

The potential contamination in the ground has not been investigated or remediated. Omega has retained an experienced environmental consultant to develop a testing and sampling plan to determine the scope of the potential contamination and the appropriate remediation steps needed. It is anticipated that the testing and sampling plan will be developed in conjunction with appropriate state and federal agencies.

11. Explain in detail all measures taken or to be taken to ensure that the violation disclosed will not be repeated. Include in your discussion any improvements made to *Company's* environmental auditing or due diligence efforts in an attempt to prevent recurrence of the violation.

These violations were the direct result of two former employees who consistently lied and concealed the existence of these problems. Omega terminated those employees (for unrelated reasons) and installed new management, who are currently taking all appropriate steps to ensure that there is no recurrence of the violations. No violations have occurred since at least July 8, 2013. Moreover, Omega has retained an environmental consultant to review all of its waste handling and disposal practices to ensure that no further violations occur.

12. Did the violation result in any serious actual harm to human health or the environment? Provide a full explanation of how this conclusion was reached.

Because the violations were just discovered, the extent of the contamination is not known. Omega has retained an environmental consultant firm to develop a testing/sampling plan to determine the extent of the contamination and then to develop a remediation plan. No actual serious harm reportedly occurred.

13. Did the violation present or may it present, any form of endangerment to public health or the environment? Provide a full explanation of how this conclusion was reached.

See response to 12 above.

14. Did the violation violate the specific terms of a judicial or administrative order or consent agreement? If so, please identify the order or agreement.

No judicial or administrative orders or consent agreements were in place at the time of the violations disclosed.

WOODS ROGERS <sup>P
L
C</sup>
ATTORNEYS AT LAW

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September 27, 2013

VIA E-MAIL (JOHN.FREUDENBERG@NEBRASKA.GOV);
(DAVID.COOKSON@NEBRASKA.GOV)

The Honorable Jon Bruning
Nebraska Attorney General
Office of the Attorney General
2115 State Capitol
Lincoln, NE 68509

**Re: Summary of Internal Investigation
Omega Capital, Gering, NE**

Dear Mr. Bruning:

As per our recent discussions, we are providing this summary of our internal investigation of Omega Capital, LLC, a Virginia limited liability company (hereinafter "Omega"), a locomotive repair and refurbishing business based in Gering, Nebraska. Our firm, which has represented Omega's majority owner, Graham-White Manufacturing Co. (hereinafter "GW") for many years, recently conducted the investigation at Omega's facility in Gering, after an Omega employee complained about the conduct of Omega's then president and minority owner, Roger Beitel. We interviewed numerous current and former Omega employees and reviewed corporate records. As discussed in more detail below, the investigation revealed a wide pattern of potentially criminal misconduct by Roger Beitel, his son, Allen Beitel, and a long-time Omega employee, Eric Longoria.

By providing this factual summary, and otherwise cooperating in any state or federal criminal investigation that may result, we are following the revised directives of the United States Department of Justice regarding voluntary disclosure by a corporation. See "Principles of Federal Prosecution of Business Organizations," United States Attorneys' Manual (USAM) § 9-28.00. Accordingly, GW is expressly not waiving any attorney-client privilege or work-product protection that applies to any communications and documents made during our internal investigation. Any waiver of the attorney-client privilege and work-product protection is thus limited to the information contained in the four corners of this document. No other waiver, express or implied, is intended.

As background, Omega is engaged in the business of offering locomotive repair, overhaul, fabrication and related services and providing locomotive components, including, but

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The Honorable Jon Bruning
September 27, 2013
Page 3

Beitel Holdings continues to hold a 40% interest in ATR Investments and we believe that Roger Beitel and Allen Beitel continue to hold ownership interests in Beitel Holdings.

Subsequent to the termination of the Beitels, GW also decided to conduct a more thorough internal investigation into Roger Beitel's misconduct led by outside counsel. The investigative team included the undersigned, a former federal prosecutor, and Lanny Hanks, a retired Nebraska law enforcement officer. We traveled to the Omega facility in Gering on September 3, 2013, and, over the course of four days, interviewed numerous current and former employees and collected and reviewed company records and documents. As outlined below, we determined that Roger Beitel, Allen Beitel, and long-time Omega employee, Eric Longoria, had committed and/or directed numerous acts of misconduct. This misconduct can be divided into two general categories: (1) theft and misappropriation of Omega property and labor; and (2) potentially fraudulent activity that may have affected Omega's customers.

With respect to theft and misappropriation, we determined that Roger Beitel, Allen Beitel, and Eric Longoria regularly stole scrap material, including locomotive batteries, from the Omega facility and subsequently sold this scrap to at least three scrap-metal dealers. Based on the employee interviews and invoice records we obtained from one of these dealers, it appears that the Beitels and Longoria likely made several hundred thousand dollars from stealing and selling Omega's scrap batteries over the last three years. (Several employees indicated that the Beitels and Longoria also stole scrap radiators from the Omega facility, but we have been unable to corroborate that through invoice and other records.) In addition to stealing scrap batteries from Omega, we determined that Roger Beitel and Allen Beitel regularly stole other items, including lumber, metal, and miscellaneous building material, from the Omega facility, which they subsequently used on personal renovation and construction projects at their residences and boat club. We also determined that Roger and Allen Beitel regularly used employees from the Omega facility to work at their residences, the boat club, and a family farm. Most of this off-site work occurred during the work week and was compensated through Omega's payroll system.

Regarding fraudulent conduct that may have impacted Omega's customers, several employees and former employees recalled similar incidents where Roger Beitel instructed them to replace customer parts with Omega parts and disregard the exact specifications of customer work orders. In general, these employees were unable to pinpoint when these incidents had occurred and what work orders may have been affected. Employees from Omega's quality control department also indicated that Roger Beitel regularly falsified—and ordered other employees to help him falsify—various documents. These falsified documents were subsequently provided to customer auditors. We have recovered some of these records and will make them available to your investigators. We are concerned by these employees' accounts and will work with your office to determine if any Omega customers were harmed by Roger Beitel's misconduct. Omega is also willing to take other corrective actions with respect to customers as may be reasonably warranted.

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Questions for Omega Capital

1. You indicated that disposal activities had taken place at several locations at the facility. In order to assist us in pinpointing the disposal locations, please provide map(s), aerial photographs, diagrams, or any other means of showing where the disposal took place. Specifically:

- a. disposal trenches where used oil, used oil mixtures, solvents evaporator pit waste water, evaporator pit sludge were disposed.
- b. the areas where locomotive batteries were allowed to drain directly to the soil.
- c. the location of the former Omega Capital general manager's farm and any locations on the farm where materials from the facility were disposed (if known).

A. Please see attached diagram labeled Omega Env000001. At this time the location of the former general manager's farm is not known but Omega is attempting to locate the information and will provide it to EPA when obtained.

2. What waste streams have been generated by Omega Capital at the facility since the dumping incidents occurred? Please include:

- a. solvents (list all types and please provide the material safety data sheets (MSDS) for each.
- b. used oil waste
- c. battery waste
- d. other wastes including sandblast media, paint waste, brake fluid, rust removal chemicals, coolant waste, refrigerants, etc.

A. All waste streams prior to the Beitels termination in July, 2013 are not known in their entirety. The waste streams after their termination were as follows:

- a. Solvents from a parts washer that was collected in labeled drums. Solvents (MSDS sheets attached as OMEGA ENV000347-000360) used:**
 - i. Tectyl 506
 - ii. Dyna 143
 - iii. Xylene
 - iv. Indusol
- b. Used oil from motor repair work was collected in the used motor oil pit.**
- c. Used oil mixture was collected from the evaporator pit and placed in labeled drums.**
- d. Occasional sandblasting of rust on locomotive parts was performed.**
- e. Paint waste was collected at two puncture stations into labeled drums.**
- f. Used compression oil was drained from motors into labeled drums.**

g. All batteries that were not refurbished were collected by a third party contractor (B&T Metals). Prior to July, 2013 the batteries were stored outside. Since that time, however, all batteries were stored inside the facility.

3. Does your facility have a RCRA ID number?

A. The facility does not have a RCRA ID number. Omega Capital has recently applied for a number and is awaiting receipt of the number from EPA.

4. How much hazardous waste did the facility produce monthly? What is the facility's generator status (i.e., conditionally exempt, small quantity, large quantity)?

A. Historically the facility identified itself as conditionally exempt small quantity generator. Since the Beitel's termination in July 2013, the facility has generated less than 200lbs per month of hazardous wastes. There was one shipment of hazardous waste by Safety-Kleen on or about November 12, 2013. A copy of the manifest and supporting documentation is attached hereto as documents labeled Omega Env00006-000015. Omega is currently investigating the origin of the "hazardous" designation of this material. Currently, it appears that the shipment was the result of an ex-employee's overly cautious designation

5. You state that you are currently leasing the facility. What is the term of the current lease (when will it terminate)?

A. The lease is a month-to-month lease. Our clients have not yet decided when they will terminate the lease.

6. You stated that two different Phase I investigations have been performed at the facility. Please provide copies of the Phase I reports for both investigations.

A. Please see attached documents labeled Omega Env00037-000335.

7. With respect to the evaporator pit, please provide historical information on the pit, its current status, its location at the facility, its capacity, its dimensions, a list of all solvents used in the pressure washing process along with MSDSs for each solvent, and any waste determinations that have been performed on the waste water from the pressure washing process prior to its placement into the evaporation pit.

A. The evaporator pit is no longer used by Omega. Historically it was used to collect rinse water from a rinsing operation of locomotive parts. The primary solvents used in the process were ZepOJ and Aluminum Brightner and Cleaner. The MSDS sheets for each are attached as OMEGA ENV000002-000005. The approximate dimensions of the pit are 46"x 94"x 50". A non-hazardous waste determination of the oily water/sludge was made in December, 2012 through

analytical testing. A copy of the testing results and the non-hazardous waste manifests are attached as OMEGA ENV000016-000036.

8. You stated that 250-gallon totes containing evaporator pit liquids were drained onto the ground behind the engine shop. Please provide a map or diagram showing the disposal location, and the approximate number of totes that were allowed to drain onto the ground.

A. Please see attached diagram labeled OMEGA ENV000001.

9. You stated that you learned of the illegal disposal activities from employees at the facility discussing it. Please provide the names and job titles of any current or former employees who may have knowledge about the disposal at the facility as well as the disposal at Mr. Beitel's farm.

A. The following former employees may have knowledge:

- a. Roger Beitel (co-owner/President)
- b. Allen Beitel (co-owner/General Manager)
- c. Shawna Payne (co-owner/front-office employee)
- d. Matt McConkey (Engine Shop supervisor)
- e. Jeffrey McClure (Maintenance)
- f. Joe Moore (Engine Shop employee)
- g. Terry Crofutt (Engine Shop employee)

The following current employees may have knowledge:

- a. Doug Williams (Interim General Manager)
- b. Margaret Ain (Quality Control supervisor)
- c. Glen Nelson (Battery Technician)
- d. John Schmunk (Engine Shop employee)
- e. Mike Descharme (Production Manager)
- f. Ray Runge (Engine Shop employee)

10. You stated that a hole was excavated near the south property line and unknown waste may have been placed into this pit and covered with soil and broken concrete. Please provide a map or diagram showing the location of this pit.

A. Please see attached diagram labeled OMEGA ENV000001

11. You indicated that an environmental consultant has been retained to develop a testing and sampling plan. Please provide the name of the consultant, his company, and a copy of any plans he has developed so far.

A. Scott Perkins, P.E., Senior Consultant, MMA Environmental, LLC. A copy of Mr. Perkins CV along with Robert List and John P. O'Connor CVs are attached hereto as OMEGA 000336-000346.

12. Finally, EPA would like to discuss with you in more detail the corporate relationships among Advanced Technology Repair, Inc., Omega Capital LLC (Nebraska), Beitel Holdings, Inc., ATR Investments, LLC, Omega Capital LLC (Virginia) and Graham-White Manufacturing Co., including types of acquisitions and/or mergers among these companies, and all parent-subsidiary relationships.

A. We are happy to discuss this during the upcoming conference call.

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(follow text)**Number**

- 1 SITE VICINITY MAP
- 2 SITE LAYOUT MAP

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(follow figures)**Appendix**

- A SITE PHOTOGRAPHS
- B AERIAL PHOTOGRAPHS
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EXECUTIVE SUMMARY

This executive summary presents key findings identified during the Phase I Environmental Site Assessment (ESA) and Limited Compliance Evaluation (LCE) of the Advanced Technology Repairs facility operated by Graham White (G-W ATR) located at 130900 Lockwood Road in Gering, Scotts Bluff Nebraska. The ESA and LCE were conducted in accordance with the scope of work presented in URS Corporation's (URS') proposal (P121-11-748) to Faiveley Transport dated November 15, 2011.

URS conducted an inspection of the subject property on December 5, 2011. G-W ATR remanufactures locomotive engine components, compressors, blowers, refrigerators, radiators and other equipment for railroad cars and railroad locomotives. Cores arrive on the site and are disassembled. Components are disassembled and cleaned by pressure washing with a cleaning solution. A small amount of cleaning with Stoddard solvent is conducted in two small parts washers in the building. Following cleaning, some additional machining is conducted as needed. Cleaned parts are gauged, and gaskets are replaced. The components are assembled and tested. Small components are painted on request in two small paint spray booths. Finished parts are packaged and shipped from the site.

The warehouse has a series of interconnected buildings with approximately 50,000-square feet divided into offices and areas for storage, and production. The office area has approximately 2,104 feet and is located in the original area of the building. Additional offices are located in the mezzanine above the refrigeration area. Production areas occupy the majority of the building and are comprised of areas for small parts assembly and disassembly, refrigeration area, battery reclaim area, power assembly area, engine area, radiator area, welding shop, storage, saw mill, locker rooms, and shipping and receiving areas.

The site has exterior storage areas for fuel, used and new oils, welding gases, and evaporator sludge. A containment pad south of the building has a 500-gallon single-wall gasoline aboveground storage tank (AST) used for fueling vehicles, and a flammable materials cabinet for compressed gases. A hazardous materials storage area consisting of a concrete pad and a containment sump is located to the south of the building and was used to store up to 250-gallon totes of used oil and 55-gallon drums of new oil. URS observed 13 totes and 20 drums on the pad during the site reconnaissance. Twelve 55-gallon drums of evaporator sludge were stored on pallets in an unpaved area near the hazardous materials storage area.

The subject site generates sanitary wastewater from restrooms and a break kitchen, which is discharged to the City of Gering sanitary sewer system. Contact wastewater from the wash bay flows to a trench drain and then enters a sump in the evaporator room. The water is then pumped to the evaporator. The resulting evaporator sludge is stored in drums as non-hazardous waste and shipped off-site for disposal.

Stormwater from the site flows to drainage ditches. A concrete sump covered in metal was used for stormwater containment of the used oil and new oil storage area. Water from this pit is pumped to the evaporator.

Historical resources extended to 1898. URS used resources including aerial photographs, historic maps, a 2007 Phase I ESA report by Panhandle Geotechnical and Environmental, Inc. (PG&E), 2004 Documentation of Environmental Indicator Determination by EPA, 2004 Federal Register no. 69, No. 111, environmental regulatory databases, and interviews conducted in 2011 during the site reconnaissance for information regarding the site.

In 1898, the subject site was undeveloped or agricultural land. By 1963, a shed was mapped on the site. In 1972, the site was developed with two buildings and was operated as part of an 80 acre property by Lockwood Corporation (Lockwood). Lockwood manufactured agricultural and irrigation equipment on the larger property. In 1976, the 80-acre property was purchased by Agromac International (Agromac), which continued the manufacturing activities of Lockwood. The area comprising the subject site was used for galvanizing metal. Other activities conducted on the site included acid regeneration, solvent recycling, and paint storage. Wastewater was treated in an un-lined evaporation pond located on the current southwest adjacent property (off-site). The pond was closed in 1978, and a lined evaporation pond was developed north of the original pond. The last pond was closed in 1984, and the site entered the Resource Conservation and Recovery Act (RCRA) Corrective Action Program (CORRACTS). Stabilization measures were undertaken for the ponds in 1985 and the ponds were closed in 1986. The site received a RCRA Post Closure Permit in 1989 under an Administrative Consent. Additional stabilization measures and investigations were undertaken of the subject site in 1992 and 1993.

In 1996, Agromac leased the subject site to Powerhorse Lockwood Irrigation (Powerhorse Lockwood). In 1999, Powerhorse Lockwood declared insolvency, and the facility was transferred to the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) program (Superfund). The site, now known as Agromac-Lockwood underwent a Superfund-lead Removal Action in 2000-2001. Groundwater sampling

conducted in 2002 and 2004 identified a variety of volatile organic compounds (VOCs) in groundwater at concentrations less than the Maximum Contaminant Levels (MCLs) and Preliminary Remediation Goals (PRGs), and a variety of metals, with manganese and arsenic exceeding the MCLs and PRGs in 2004. On November 30, 2006, the site was assigned a No Further Remedial Action Planned (NFRAP) status by EPA Region 7.

In 2007, ATR purchased and renovated the site. The original evaporator ponds were not part of the purchase and were not part of the subject site. ATR began remanufacturing parts for locomotive engines and railroad cars on the site. Additions were made to the building in 2007 and 2008. Graham-White obtained 60% ownership in the business in 2010, and ATR sold the property comprising the subject site to Beitel Enterprises in 2011.

In addition to the RCRA CORRACTS and CERCLIS databases, the subject site was identified on the RCRA treatment, storage, and disposal facility (TSDF), US Engineering Controls, US Institutional Controls, State Hazardous Waste Site (SHWS), Leaking Underground Storage Tank (LUST), and RCRA non-generators (NonGen) databases as Agromac-Lockwood. Lockwood Corporation was listed on the LUST, Facility Index System (FINDS) and Integrated Compliance Information System (ICIS) databases. The CERCLA and CORRACTS activities were discussed above. According to information from the 2007 Phase I ESA report by Panhandle Geotechnical and Environmental, Inc. (PG&E), the UST was removed during the Superfund removal actions. No additional information regarding the former tank has been received to date.

The current site operations were not identified on environmental databases searched by EDR.

The subject site was located in a light industrial and commercial area. The north adjacent property, Progress Rail Services was listed on the RCRA small quantity generators (SQG) database since 2008. Magnolia Homes and Guerdon Industries adjoined the west of the site and were listed on the RCRA-NonGen, LUST, and UST databases. The LUST incident is open and undergoing remediation or additional investigation. No other adjoining facilities or open and upgradient incidents were identified.

URS has chosen an appropriate level of effort consistent with the American Society for Testing and Materials (ASTM) E 1527-05 for evaluating the status of the property. Based on the scope of activities conducted, the following findings were identified:

Issue Type	Issue	Recommendations	Estimated Risk Level
------------	-------	-----------------	----------------------

			(Dollars)
RECs	<p>The subject site is located on land that was part of the Agromac-Lockwood Superfund removal activity and CORRACTS. Activities under CERCLA and CORRACTS were closed with a NFRAP on November 30, 2006. Operations on the site included galvanizing and pickling by Lockwood, Agromac, and Powerhorse Lockwood. Acids, metals, and solvents were used on the site. The residual concentrations were reported to be above background level in 2004; however, the concentrations were not available in on-line resources. Arsenic and manganese exceeded their respective MCL and PRG in groundwater.</p> <p>Agromac-Lockwood is identified as the responsible party for prior environmental waste on the site. However, without a thorough understanding of the areas of historic site use and residual concentrations in soil and groundwater, overlapping areas of impact and use in the event of a spill or a re-opened Superfund investigation could involve the subject site owners and operators as potentially responsible parties.</p>	Conduct a file review to obtain mapped locations and descriptions of the extent of remediation conducted, areas impacted, and residual contamination levels on the subject site so that potential overlapping areas of use or potential contaminants can be identified.	>1,000,000
	<p>A LUST incident was reported to be closed and the UST removed; however, the location of the tank and residual contamination levels were not available from on-line resources or the subject site. There is a potential for overlap between oil and fuel storage areas currently used by the site and the former UST location.</p>	URS recommends a file review be completed for this tank and the former location and soil and groundwater conditions at the time of removal be documented.	100,000-1,000,000
	<p>The subject site has a Declaration of Restrictive Covenants for Environmental Protection issued by EPA that prohibits residential use of the site.</p> <p>The site was not located in an area where the use of the site for residential purposes appears likely.</p>	None	<100,000
Off-Site REC	An open LUST incident is undergoing remediation on the northwest adjacent property.	None	<100,000
Potential Environmental Compliance Issues	The subject site had approximately 4,850 gallons of petroleum products stored in containers 55-gallons and larger and exceeded the 1,320-gallon threshold requiring an SPCC plan. A Contingency	URS recommends an SPCC Plan be prepared and implemented for the site	<100,000

	Plan was identified for the site; however, some elements specified by SPCC regulations were not included in the Contingency Plan.		
	The site does not have a Nebraska Pollutant Discharge and Elimination System (NPDES) permit for stormwater. G-W ATR conducts operations identified as SIC code 3743 for railroad equipment. Facilities under this SIC code are required to have an NPDES permit. In addition to an NPDES permit, the site will require a stormwater pollution prevention plan (SWPPP) to manage stormwater discharges from the site.	URS recommends the site apply for an NPDES permit and draft and implement a SWPPP.	<100,000
	An evaporator, two small paint booths, and two oil burners were operated on the site, and evaporation of Stoddard solvent was identified during site processes. The site does not have an air permit and the potential need for an air permit had not been evaluated.	URS recommends the facility be evaluated for the applicability of an air permit for emissions	<100,000
	The site was not identified as a RCRA generator of hazardous waste. Parts washers used Stoddard solvent that reportedly evaporates through use and has not required disposal.	The site should manage parts washers to reduce evaporation.	<100,000
Potential Environmental Business Risks	Based upon the date of construction, there is a potential for asbestos and lead-based paint to have been used in the building. No sampling has been identified for the building interiors, piping, and roofing materials.	Sampling should be conducted prior to any renovation or demolition in the building. An operation and maintenance (O&M) plan should be developed and maintained by the site. This document can be used to track areas sampled, results of the sampling, and areas where sampling and abatement have occurred.	<100,000
	URS observed twelve 55-gallon drums of evaporator sludge (characterized by analysis as non-hazardous waste) staged on pallets in an unpaved area outside of the building.	URS recommends an impermeable surface be used for the storage area, to reduce the risk of impacts from small spills.	<100,000
	A sump was used for the management of stormwater from the oil storage area outside of the building. The sump could not be inspected.	URS recommends the containment be inspected.	<100,000

	URS observed oil stains beneath the oil totes connected to the oil burners. Absorbents were used to dry the spills.	URS recommends using secondary containment for the totes connected to the oil burners to contain spills.	<100,000
Safety	The site uses safety policies implemented for ATR prior to partnership with G-W. Copies of the Workplace Safety and Reporting and Personal Protective Equipment Policies were provided to URS. The site holds weekly safety meetings.	URS recommends the safety policies used by G-W ATR be reviewed for consistency with G-W policies.	<100,000
	Material Safety Data Sheets (MSDS) are available in the employee break area.	None	<100,000
	The site required safety glasses, steel toed boots, ear plugs and hard hats in the production areas of the building. Specific tasks are identified as requiring additional PPE. URS observed limited use of hard hats in the building. The PPE assessment provided by G-W for the ATR facility was incomplete.	URS recommends the PPE Assessment for G-W be expanded to include all areas of the G-W ATR facility and a review be conducted to determine if additional assessment is required to include improved delineation of hard hat areas.	<100,000
	Approved breathing apparatus are required for painting and welding in the building. Air monitoring has been conducted in the building; however, an exposure assessment has not been conducted	URS recommends an exposure assessment be considered for workers on the site.	<100,000
	URS observed hearing protection in use in the building. According to the site contact, a noise survey had been conducted at the site. However, a copy of the survey has not been provided to date	URS recommends a noise survey be conducted if a prior study cannot be located.	<100,000

1.0 PROPERTY SUMMARY

This report presents the results of the Phase I ESA and Limited Compliance Evaluation (LCE) of the Advanced Technology Repairs facility operated by Graham White (G-W ATR) located at 130900 Lockwood Road in Gering, Scotts Bluff, Nebraska. The ESA and LCE were conducted in accordance with the scope of work presented in URS' proposal (P121-11-748) to Faiveley Transport dated November 15, 2011.

1.1 PURPOSE

The purpose of this Phase I ESA was to assess the environmental status of the subject property by identifying existing or potential RECs that can be reasonably anticipated and to conduct a limited compliance evaluation. This assessment was based on a review of existing conditions, reported pre-existing conditions, and operations at the site and adjacent properties. This ESA was conducted in accordance with the Standard Practice for ESAs: Phase I ESA Process E 1527-05 established by the ASTM.

1.2 LIMITATIONS AND EXCEPTIONS OF ASSESSMENT

URS has performed the scope of work set forth in the proposal related to this project, in specific reliance on the understandings and agreements reached between URS and Faiveley Transport and the Project Proposal P121-11-748, dated November 15, 2011. URS' scope of work was limited to that stated in the proposal.

This report was prepared at the request and for the sole use of Faiveley Transport and their successors and assigns, and the contents hereof may not be used or relied upon by any other party without the express written consent of URS and Faiveley Transport. Any use or reliance by a third party shall be at that party's sole risk.

Along with all of the limitations set forth in various sections of the EPA 40 Code of Federal Regulation (CFR) Part 312 Standards and Practices for All Appropriate Inquiries (AAI) – Final Rule approved November 1, 2005, and the ASTM Standard Practice for ESAs (Standard E 1527-05) approved November 18, 2005, the accuracy and completeness of this report may be limited by the following:

Access Limitations – URS accessed the building on site as made available by the site contact. Interviews were not conducted with the adjacent property owners or tenants.

Physical Obstructions to Observations – Pallets, totes, and equipment limited visibility of the surface areas inside of the building. Snow cover on areas of the site and the presence of stored materials outside of the building limited URS' observation of ground surfaces.

Outstanding Information Requests – Information has not been received from the fire department, EPA Region 7, and the site contact.

Historical Data Source Failure – Historical resources dated from 1898 and did not pre-date the first potential use of the site for agriculture. URS used resources including historical photographs, maps, regulatory databases, city directories, prior environmental reports, on-line resources, and interviews with the site owner. Historic site features, activities, EPA-lead Removal Action areas, and post remediation sampling data have not been received to date and is potentially significant.

Other – An environmental lien search was not requested by the client and was not obtained for the site. A title history was not provided by the client for review.

It should be noted that although this assessment included an LCE, an audit of operational environmental compliance and safety issues was not conducted. Where required, the documents listed in the Appendices, were used as reference material for the completion of the Phase I ESA. Some of the information presented in this report was provided through existing documents and interviews. Although attempts were made, whenever possible, to obtain a minimum of two confirmatory sources of information, URS in certain instances has been required to assume that the information provided is accurate.

URS' services in the development of this report were conducted, within the limits prescribed by the Agreement, in a manner consistent with that level of care and skill ordinarily exercised by members of the same professions currently practicing in the same locality under similar conditions and no other guarantee, warranty, or representation, either express or implied, is included or intended herein.

Client recognizes and agrees that:

- 1) The information in the Report relates only to the property specifically described in the Proposal and Report.
- 2) The information and conclusions provided in the Report apply only to the site as they existed at the time of URS' site examination. Should the site use or conditions change or should there be changes in applicable laws, standards, or technology, the information and conclusions in the Report may no longer apply.

- 3) URS makes no representations regarding the value or marketability of this site or their suitability for any particular use, and none should be inferred based on the Report.
- 4) The Report is intended to be used in its entirety and no excerpts may be taken to be representative of the findings of this investigation.

To receive liability protection under CERCLA, in addition to conducting AAI, Faiveley Transport has the continued obligation of:

- 1) Taking steps to stop new or continued releases.
- 2) Complying with any land use restrictions and providing any legally required notices.
- 3) Not impeding the effectiveness or integrity of any institutional controls.
- 4) Providing cooperation, assistance, and access to U.S. EPA, state, or other parties conducting response actions or natural restoration of the property.
- 5) Complying with Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) information requests and subpoenas.

2.0 PROPERTY DESCRIPTION

2.1 LOCATION

The subject site is situated in a commercial and light industrial area in Gering, Nebraska. The site is in an irregular-shaped lot located to the north of D Street and 200 feet to the west of Lockwood Road (also known as 21st Avenue). The subject site address is 130900 Lockwood Road, Gering, Nebraska 69341. According to the Scotts Bluff County Tax Assessor's website, the parcel is identified as 010229760. The legal description is LT 2, AGROMAC SUB.

A site vicinity map is presented as Figure 1. A site layout map is presented as Figure 2. Photographs of the site are presented in Appendix A.

2.2 NATURE OF PROPERTY

At the time of the site reconnaissance, the subject site was an approximately 40-acre fenced property developed with a warehouse building and paved and gravel areas for access, parking, and loading. The warehouse is a series of interconnected buildings with approximately 50,000-square feet constructed with a steel frame, metal walls and roof, and

a concrete slab. The building is divided into offices and areas for storage, and production. The office area has approximately 2,104 feet and is located in the original area of the building. Additional offices are located in the mezzanine above the refrigeration unit repair area. The offices are finished with drywall, vinyl floor tile, and suspended ceiling tiles.

Production areas occupy the majority of the building and are comprised of areas for small parts assembly and disassembly, refrigeration area, battery reclaim area, power assembly area, engine area, radiator area, welding shop, storage, saw mill, locker rooms, and shipping and receiving areas.

- The engine room has a wash bay with a trench drain. Water from this area flows to the sump in the evaporator room, then is pumped to a separator to reclaim oils. The wash water is then evaporated. The majority of chemical storage is located in the evaporator room. URS observed two 55-gallon drums of Stoddard solvent, a 55-gallon drum of engine oil, and a flammable materials cabinet containing 162 cans of spray paints and other chemicals in the evaporator room.
- Two oil burners were used to heat the warehouse. One burner is located in the small parts area and the other is located in the engine area. Oil is pumped from 250-gallon totes to the burners. URS observed oil spilled on the floors beneath the totes. The spills were covered with absorbents and no secondary containment for the totes was used.
- Two small paint booths are located in the warehouse. The paint booths are three-sided structures located in the engine room and the small parts area. The booths vent to the roof.
- With the exception of the wash bay, no floor drains were observed in the production areas of the building.

The site has exterior storage areas for fuel, used and new oils, welding gases, and evaporator sludge. A containment pad south of the building has a 500-gallon single-wall gasoline aboveground storage tank (AST) used for fueling vehicles, and a flammable materials cabinet for compressed gases. A hazardous materials storage area consisting of a concrete pad and a containment sump is located to the south of the building, where 250-gallon totes of used oil and 55-gallon drums of new oil can be stored. URS observed 13 totes and 20 drums on the pad during the site reconnaissance. Twelve 55-gallon drums of evaporator sludge were located on pallets in an unpaved area near the hazardous materials storage area. An empty and reportedly clean 10,000-gallon tank that previously contained sulfuric acid was located to the south of the containment areas. Compressed gases for welding and forklifts are located in a fenced area to the west of the small parts area of the building.

Paved areas for parking and loading adjoin the building. The balance of the site was graded and vegetated in grass. URS observed several piles of dirt on the south side of the site that were reportedly from grading activities on the site.

The site receives electrical, water and wastewater services from the City of Gering.

Stormwater is unmanaged and flows to unlined drainage ditches. The ditches discharge to the Gering Irrigation Ditch south of the site.

2.3 CURRENT USES OF PROPERTY

G-W ATR remanufactures locomotive engine components, compressors, blowers, refrigerators, radiators and other equipment for railroad cars and railroad locomotives. Cores arrive on the site and are disassembled. Components are disassembled and cleaned using pressure washing with a cleaning solution. A small amount of cleaning with Stoddard solvent is conducted in two small parts washers in the building. Following cleaning, additional machining is conducted as needed. Cleaned parts are gauged, and gaskets are replaced. The components are assembled and tested. Small components are painted on request in two small paint spray booths. Finished parts are packaged and shipped from the site.

Wash water flows from a trench drain to a sump. The water is then pumped to a separator to remove oils and then to the evaporator. The resulting evaporator sludge is stored in drums as non-hazardous waste and shipped off-site for disposal. Accumulated used oil is burned in two oil burners located in the building.

The battery reclaim area receives batteries from clients. The batteries are wiped clean, recharged, tested, and returned to clients or sent to Napa for recycling.

Forklifts using propane, gasoline, and electric power are operated on the site. Equipment maintenance is conducted throughout the building. A fueling area is located south of the building, where a 500-gallon gasoline AST is located.

A 1,000-gallon propane tank is used to fuel the evaporator. Propane cylinders for the forklifts are refilled by Westco.

2.4 PHYSICAL SETTING ANALYSIS

2.4.1 Physiography

The United States Geological Survey (USGS) 7.5-minute topographic map of the Scottsbluff South, Nebraska quadrangle indicates that the site elevation is approximately 3,880 to 3,890 feet above mean sea level (USGS, 1963). Topography in the study area is relatively flat with a subtle slope to the southeast. In the absence of man-made influences (e.g. storm water systems and drainage ditches) surface runoff from a the subject property likely flows generally southeast towards Gering Drain, mapped approximately 1,000 feet south of the subject property. The average annual precipitation in the study area is approximately 16 inches and the average annual runoff, in undeveloped areas, is approximately 0.5 inch (Miller and Appel, 1997).

2.4.2 Geology

The site is located in the High Plains section of the Great Plains physiographic province (USGS, 2011). Surface soils are mapped on site as the Mitchell silt loam (USDA, 2011). Mitchell soils generally occur on stream terraces and are derived from silty alluvium derived from calcareous siltstone. Mitchell soils are somewhat poorly drained and are characterized by a moderately high to high ability to transmit water through the most restrictive unit and very high available water holding capacity. Unconsolidated, coarse grained stream valley alluvial deposits likely underlie surface soils at the subject site (Miller and Appel, 1997). Quaternary and Tertiary age sedimentary rocks likely underlie alluvial deposits at the subject site.

2.4.3 Hydrogeology

The surficial aquifer and the High Plains aquifer are mapped in the study area and likely serve as a regional source for groundwater (Miller and Appel, 1997). Groundwater in the surficial aquifer is generally stored in sand and gravel dominated units associated with the aforementioned alluvial deposits. Groundwater in the High Plains aquifer is generally stored in siltstone, sandstone and channel deposits associated with the Brule Formation. Numerous water wells are reported within 1.0 mile of the subject site (EDR, 2011). Depth to uppermost groundwater is reported from several shallow wells at depths ranging from approximately 13 to 18 feet below ground surface. Based on information provided by EDR and local topography, uppermost groundwater is likely encountered within 20 feet of the ground surface at the subject site in alluvial deposits, but may occur at shallower depths

under perched conditions and seasonally. In the absence of man-made influences (e.g. pumping) uppermost groundwater likely flows generally east or northeast. Areas within approximately 1,600 feet generally west of the subject site appear to be hydraulically upgradient.

3.0 HISTORICAL RECORDS REVIEW

3.1 INTERVIEWS

Name	Site affiliation
Mr. Roger Beitel	President of Mega Capital, a Division of Graham-White

URS representative Vanessa Scott interviewed Mr. Beitel during the site reconnaissance conducted on December 5, 2011. The site contact accompanied URS on the site tour. The site contact provided URS with current and historical information regarding use and development of the subject site. According to Mr. Beitel, the site was used as a galvanizing plant from the 1970's through 1994. A former Superfund site is located on the southwest adjacent property and was operated by Agromac-Lockwood,. A 1,000-gallon underground storage tank (UST) was removed from the subject site during the Superfund cleanup. Mr. Beitel stated that the adjacent Superfund area was excavated to 20-25 feet and had been impacted by wastes from galvanizing. The groundwater monitoring wells are no longer sampled but remain in case future sampling is required. Mr. Beitel stated that he had a water sample collected and analyzed from one of the wells in 2007 and no contaminants were detected. A copy of this information has not been received by URS. Additional information provided by site contact is discussed throughout the report.

3.2 HISTORICAL AERIAL PHOTOGRAPH INTERPRETATION

URS reviewed aerial photographs of the subject property vicinity acquired from EDR for the years 1962, 1976, 1984, 1989, 1993, 1999, 2005, 2006, and 2007. A copy of the aerial photographs is included in Appendix B.

1962 **Scale: 1 inch = 500 feet**
Quality: Good

The subject site was agricultural land and no buildings were shown on the site. Agricultural land adjoined the site. An irrigation canal formed the southern property boundary, followed by D Street. Lockwood Road was

located 200 feet to the east of the site. Railroad tracks adjoined the northwest of the site.

1976
Scale: 1 inch = 750 feet
Quality: Poor

An "L" shaped building appeared to be located on the site. Two small sheds were located to the southwest of the site. The majority of the site was open land; however, soil disturbance was visible to the west, east, and immediately south of the building. An industrial building adjoined the northwest of the site. A rail spur appeared to adjoin the west of the site, followed by three commercial or industrial buildings. Land adjoining the east of the site was indistinguishable from land immediately east of the building.

1984
Scale: 1 inch = 1,000 feet
Quality: Fair

Several structures were located on the west side of the building. The other areas of the site appeared relatively unchanged from 1976. The buildings west of the railroad tracks were not visible. The remaining adjacent properties appeared relatively unchanged from 1976.

1989
Scale: 1 inch = 1,000 feet
Quality: Good

Exterior storage was shown on the north and west sides of the building and south of the site. Storage areas on the north side of the site extended onto the north adjacent property. The building north of the site had been expanded since 1984. A narrow shed or trailer was located on the east adjacent property and the property appeared to be related to activities conducted on the subject site. A rectangular-shaped area vegetated in grass appeared to be located on the southwest adjacent properties. Properties located further to the east and south of the site appeared relatively unchanged from 1984. The buildings west of the site were clearly visible in this photograph.

1993
Scale: 1 inch = 750 feet
Quality: Good

Exterior storage on the site was still visible to the south and immediately northwest of the building. Other areas of the site appeared to have been graded. A trailer or shed was added north of the site and exterior storage was still visible on the property. Exterior storage was not visible on the east adjacent property. The remaining adjoining properties appeared relatively unchanged from 1989.

1999
Scale: 1 inch = 500 feet
Quality: Good

The subject site and east adjacent property appeared to be operated separately from the north adjacent property. Exterior storage areas were shown to the north of the building, and an area smaller than the current subject site appeared to be fenced. Small mounds of debris or soil were visible on the south side of the site. A trailer was located in this area. The west side of the site was unevenly vegetated. The electrical substation was shown to the west of the site. A small concrete pad or shed was located on the west side of the site. A dirt drive extended from the southwestern portion of the site to the north adjacent property. The building north of the site had been expanded, doubling its size. The remaining adjoining properties appeared relatively unchanged from 1994.

2005
Scale: 1 inch = 500 feet
Quality: Good

The subject site and east adjacent properties appeared to be unused. The land was vegetating on the south and west sides of the site. The trailer remained on the southern side of the site, and several small areas of potential material storage were observed south of the building. Activities on the north adjacent property appeared reduced and with exception of a loading dock, little activity was visible near the subject site boundary. Property east of Lockwood Road appeared to be residential. A commercial building and a storage business were shown south of D Street. The remaining adjoining properties appeared relatively unchanged.

2006
Scale: 1 inch = 500 feet
Quality: Good

The subject site and most adjoining properties appeared relatively unchanged from 2005. An addition was made to the building south of the site. Grain elevators were added 750 feet to the east of the site.

2007
Scale: 1 inch = 500 feet
Quality: Good

Two small outbuildings were added to the northwest of the building between 2006 and 2007. The balance of the subject site and adjoining properties appeared relatively unchanged from 2006.

3.3 HISTORIC MAP REVIEW

URS reviewed the 30-minute USGS topographic map of the Scotts Bluff, Nebraska quadrangle (1898), and the 7.5-minute topographic map of the Scotts Bluff North, Nebraska quadrangle (1963 and photorevised 1976) for historic land uses on the subject site and surrounding properties. In 1898, the subject site was mapped as undeveloped or agricultural land to the west of the road now known as Lockwood Road. No buildings were mapped on properties adjoining the site.

In 1963, the subject site was mapped with a shed in the southern portion of the site. Undeveloped or agricultural land adjoined the north of the site. Undeveloped or agricultural land adjoined the east of the site, followed by the road now known as Lockwood Road. An irrigation canal formed the southern property boundary, followed by undeveloped or agricultural land. The west adjacent property was mapped as undeveloped or agricultural land and railroad tracks.

The subject site was mapped with an "L" shaped building and access drives in 1976. The shed remained on the site. Two small buildings were mapped on the southwest side of the site. The site was depicted in an industrial and rural area. A large industrial plant was mapped to the north of the site. The west adjacent property was developed with two commercial buildings. Rural development was mapped to the south of the road now known as D Street and east of Lockwood Road.

A copy of the historic topographic maps is included in Appendix C.

URS ordered Sanborn Fire Insurance maps for the subject site and vicinity; however, Sanborn map coverage was not available.

3.4 CITY DIRECTORY ABSTRACT

URS ordered a City Directory Abstract for the subject site from EDR; however, city directory coverage was not available.

3.5 TITLE RECORDS

URS did not review title records for the subject property. An environmental lien search was not performed or reviewed by URS as part of this assessment.

3.6 PRIOR REPORTS

The client provided URS with a copy of a Phase I ESA dated February 16, 2007 prepared for Mr. Roger Beitel by Panhandle Geotechnical and Environmental, Inc. (PG&E). For the purpose to the report, PG&E referred to the subject site as Powerhorse/Lockwood Irrigation Property, which was identified as a prior occupant of the site. According to the table of contents, a site sketch was not prepared for this report.

In 2007, the subject site was occupied by ATR and was used for the repair of equipment for the rail industry. The building was undergoing cleaning and renovation by ATR and

historic features not intended to be used by ATR were being closed or modified. PG&E observed what was described by Mr. Beitel as a former galvanizing pit covered with a steel plate in the east end of the building and a former acid recycling room, which was vacant.

On the exterior of the property, PG&E observed an area to the south of the building where a sulfuric acid tank and a hazardous waste storage tank were previously located. The concrete containment areas were used for petroleum storage by ATR. According to Mr. Beitel, petroleum was stored in this area by the prior tenant. One containment area had a concrete sump used for stormwater collection. Pickling tanks and a rail car formerly used by Powerhorse/Lockwood Irrigation remained on the site.

The site owner, Mr. Joe Schon provided PG&E with a Phase I ESA report prepared in 1997 and the text of the Final Report for Removal Assessment Activities dated March 14, 2002. No pending investigations were identified by Mr. Schon. PGE also interviewed EPA On-Scene Coordinator Kevin Larson with the Enforcement/Fund Lead Removal Branch of EPA Region 7. On December 28, 2006, Mr. Larson stated that "everything of concern" had been removed from the site, and no additional work was necessary. Mr. Larson stated that should other conditions related to past environmental concerns in connection with the property, Agromac International (Agromac) would most likely remain the responsible party. However, Mr. Larson indicated that the Superfund Law was written to allow EPA to take enforcement action against any and all parties in connection with the property regardless of who was the responsible party at the time the environmental concerns began.

Mr. Beitel provided PGE with a copy of the Declaration of Restrictive Covenants for Environmental Protection issued by EPA that prohibited residential use of the site.

No recognized environmental conditions (RECs) were identified by PGE. The following historic REC (HREC) was identified:

- "The state and federal inspections which led to the discovery of contamination and therefore removal activities on this property have been addressed by the property owner, Mr. Joe Schon. The EPA submitted a letter dated June 9, 2005 indicating that no further action is necessary at this time."

A copy of this report is provided in Appendix E.

3.7 OTHER RESOURCES

URS obtained the following additional information for the Agromac-Lockwood site from on-line resources: Documentation of Environmental Indicator Determination dated September 21, 2004 by EPA Region 7 (maps were not provided) and a Federal Register (FR) publication dated June 9, 2004.

The subject site was previously part of an 80 acre property operated by Lockwood Corporation (Lockwood). Lockwood manufactured farm machinery and irrigation equipment on the larger property from 1972-1976. Activities conducted on the subject site included galvanizing using a pit and acid regeneration. Agromac purchased the larger property in 1976 and continued using the subject site for galvanizing. Galvanizing operations on the site used evaporation ponds located on the current southwest adjacent property to manage wastewater and hazardous wastes from 1972-1984. The site began participation in Resource Conservation and Recovery Act (RCRA) Corrective Action program (CORRACTS). The site obtained a RCRA Post Closure Permit for the impoundments in 1989. Additional stabilization measures and investigations were undertaken on the site in 1992 and 1993. In 1989, Agromac obtained a RCRA Post-Closure permit from the State and a Corrective Action Permit from EPA Region 7.

From 1996 to 1999, Agromac leased the area occupied by the subject site to Powerhorse Lockwood Irrigation (Powerhorse Lockwood), a manufacturer of irrigation equipment. In 1999, Powerhorse Lockwood became insolvent and the site was transferred to EPA Region 7 for a Superfund-led Removal Action and was referred to as Agromac-Lockwood Superfund Site (Agromac-Lockwood). At the time of insolvency, seven 5,000-gallon treatment tanks some containing caustic materials were located in the galvanizing building. Following removal of the galvanizing solutions and tanks, the EPA conducted extensive soil and groundwater sampling in 1999, 2002, and 2004.

Six Solid Waste Management Units were identified on the site:

- The hazardous waste storage area was a gravel-covered area located to the south of the galvanizing plant, where drums containing waste solvents from painting operations and corrosive sludges from acid tank cleanout were stored. Soils in this area reportedly did not exceed the EPA Action levels, but lead and zinc exceeded background levels.
- Waste oil storage area was located to the southeast of the building. Waste oils and solvents were stored in drums prior to offsite disposal. Lead and zinc and 1,1,1-trichloroethane (1,1,1-TCA) were detected in soil samples; however, EPA action

levels were not exceeded. Oil and grease concentrations were referred to as "High" in the surface soil samples. Semi-volatile organic compounds (SVOCs) were not detected.

- A scrap metal waste bin area was located to the east of the machine shop and was used to contain scrap metal. Oil stained and rust colored soils were observed in the area. Several metals in soils were reported above background levels.
- The raw product storage area was located to the south of the main plant and was used to store paints, oils, lubricants, and solvents in drums, cans, and tanks. Arsenic, chromium, lead and zinc were reported above background levels; however, lead [410 milligrams per kilogram (mg/kg)] was the only compound to exceed the EPA Action level (400 mg/kg).
- A solvent recycling and paint mixing shed was located along the south side of the warehouse and was identified as an area of concern (AOC). Solvents including methyl ethyl ketone (MEK), toluene, and xylene were used in the shed.
- A Closed Waste Lagoon was located on the current southwest adjacent property. One unlined impoundment was constructed in the 1970's and received spent acid water from the galvanizing and chain manufacturing operations. The impoundment was closed in 1978 and was replaced with an impoundment developed with a bentonite liner and located north of the original impoundment. Use of the northern impoundment ended in 1984. The former impoundments are currently located on the southwestern adjacent property.

Groundwater sampling was conducted of wells located on the subject site and at off-site locations. During sampling conducted between 1999 and 2002, benzene, 2-butanone, chloroform, 2-hexanone, 4-methyl-2-pentanone, tetrachloroethylene (PCE), and trichloroethylene (TCE) were detected in groundwater at concentrations that were less than their Maximum Contaminant Level (MCL) or Preliminary Remediation Goal (PRG), and the volatile organic compounds (VOCs) were not included in subsequent groundwater sampling. Manganese, arsenic, chromium, lead, and zinc were reported in concentrations exceeding the MCL and PRGs. In 2004, TetraTech conducted additional groundwater sampling for metal analysis. Manganese at 2,780 parts per billion (ppb) and arsenic at 113 ppb were detected above the respected PRG of 880 ppb for manganese and above the 10 ppb MCL for arsenic. In 2004, zinc concentrations were 251 ppb and had declined from 15,400 ppb reported in 2002. The maximum zinc concentration did not exceed the MCL in 2004.

In June 2004, a notice of a settlement between United States, Lockwood Corporation Bankruptcy Trustee, and Agromac International was published. The agreement transferred

residual funds from the Lockwood Bankruptcy Trustee to Agromac for reimbursement of monitoring costs and fees and any additional cleanup entered into between Agromac and the EPA. A covenant not to sue was issued to the Lockwood Corporation.

As of September 21, 2004, migration of contaminated groundwater from the site was considered under control. Additional sampling was planned to confirm that migration of contaminants was not occurring laterally or vertically.

3.8 HISTORIC SUMMARAY OF OCCUPANCY

The following is a summary of occupants and uses of the subject site.

Years	Occupants	Activities conducted	Resources
1898-1962	Unknown	Undeveloped or agricultural land	1898 topographic map and 1962 aerial photograph
Prior to 1963	Unknown	The site was mapped with a shed.	1963 topographic map
1972-1976	Lockwood Corporation	The site was developed with two buildings and sheds. The site was part of a large 80 acre property operated by Lockwood for the manufacture of farm machinery and irrigation equipment. The subject site buildings were used for galvanizing. A pit and several 5,000-gallon tanks were used in the galvanizing operation. An acid regeneration room, paint storage, and solvent recycling areas were also identified for the subject site. Wastewater from the galvanizing operation was discharged to an unlined evaporation pond on the current southwest adjacent property.	1976 aerial photograph, 1976 topographic map, 2004 Documentation of Environmental Indicator Determination by EPA, 2004 FR no. 69, No. 111
1976-1999	Agromac International	Agromac purchased the site and continued farm and irrigation equipment manufacturing on the site. Activities including galvanizing continued. The waste lagoon (evaporation pond) on the southwest adjacent property was closed in 1978. The northern impoundment was constructed to the north of the original lagoon. The new impoundment was closed in 1984. The site began participation in CORRACTS in 1985 and stabilization	1984-1999 aerial photographs, 2004 Documentation of Environmental Indicator Determination by EPA, 2004 FR no. 69, No. 111, 2007 Phase I ESA report by PG&E, and 2011 Radius Map Report

Years	Occupants	Activities conducted	Resources
		measures were completed in 1986. The site obtained a RCRA Post Closure Permit for the impoundments in 1989. Additional stabilization measures and investigations were undertaken on the site in 1992 and 1993.	
1996-1999	Powerhorse Lockwood Irrigation	Powerhorse Lockwood leased the site from Agromac and continued galvanizing and irrigation equipment manufacturing on the site. In 1999, Powerhorse Lockwood declared insolvency and the facility was transferred to the CERCLIS program.	
1999-2004	Agromac-Lockwood and EPA	A Superfund-lead Removal Action was conducted on the site in 2000-2001. Groundwater sampling conducted in 2002 and 2004 identified a variety of VOCs in groundwater at concentrations less than the MCLs and PRGs, and a variety of metals with manganese and arsenic exceeding the MCLs and PRGs in 2004. As part of a settlement between the United States, Lockwood Bankruptcy Trustee, and Agromac International, residual funds from the Lockwood Bankruptcy Trustee were transferred to Agromac for reimbursement of monitoring costs and fees and any additional cleanup entered into between Agromac and the EPA. A covenant not to sue was issued to the Lockwood Corporation.	2004 Documentation of Environmental Indicator Determination by EPA, 2004 FR no. 69, No. 111, 2007 Phase I ESA report by PG&E, and 2011 Radius Map Report
2004-2006	Vacant	The site was assigned a No Further Remedial Action Planned (NFRAP) status on November 30, 2006.	2005 and 2006 aerial photographs, 2007 Phase I ESA report by PG&E, and 2011 Radius Map Report
2007-2010	ATR	The building was renovated. ATR conducted remanufacturing of parts for locomotive engines and rail cars on the site. In late 2007 and 2008 additions were made to the building.	2007 Phase I ESA report by PG&E, 2011 Radius Map Report, and Scotts Bluff Tax information website,
2010-Present	G-W ATR	Graham-White obtained a 60% ownership of the site ATR operations.	2011 site reconnaissance

3.9 DATA GAPS

Historical resources dating from 1898 to the present were reviewed for this assessment; Historical resources may not predate the first development for agricultural use. All tenants for the site may not have been identified. A gap in the resources between 1898 and 1962 was identified; however, the site was located in a rural agricultural area and significant non-agricultural use of the site during the data gap appears unlikely.

The mapped locations of historic activities including old evaporation ponds, storage out buildings, all soil and groundwater sampling locations, and analytical data were not readily available and are potentially significant.

4.0 REGULATORY AGENCY RECORDS SEARCH

4.1 FEDERAL AND STATE ENVIRONMENTAL RECORDS

URS contracted EDR to conduct an environmental database search for the site and surrounding land uses in accordance with ASTM E 1527-05. The following databases were searched:

DATABASE	SEARCH DISTANCE
Federal Databases	
National Priorities List (NPL) and Proposed NPL	1.0 mile
Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS)	0.5 mile
CERCLIS- No Further Remedial Action Planned (NFRAP)	0.5 mile
Resource Conservation and Recovery Act (RCRA) Treatment, Storage, and Disposal Facilities (TSDF)	0.5 mile
RCRA Large Quantity Generator (LQG)	0.25 mile
RCRA Small Quantity Generator (SQG)	0.25 mile
RCRA Conditionally Exempt Small Quantity Generator (CESQG)	0.25 mile
RCRA Non-Generator (NonGen)	0.25 mile
Corrective Action RCRA sites (CORRACTS)	1.0 mile
Emergency Response Notification (ERNS)	Target Property
Facility Index System (FINDS)	Target Property

DATABASE	SEARCH DISTANCE
State Records	
State Hazardous Waste Sites (SHWS)	1.0 mile
Solid Waste Facilities/Landfill (SWF/LF)	0.5 mile
Leaking Underground Storage Tank (LUST)	0.5 mile
Underground Storage Tank (UST)	0.25 mile
Aboveground Storage Tank (AST)	0.25 mile
Brownfields	0.5 mile
Voluntary Cleanup Program (VCP)	0.5 mile

The subject site was not identified on the databases searched by EDR.

The subject site was previously part of Agromac-Lockwood, 220759 Highway 92, and Lockwood Corporation. Agromac-Lockwood was listed on the CERCLIS-NFRAP, CORRACTs, RCRA-TSDF, US Engineering Controls, US Institutional Controls, SHWS, LUST, and RCRA-NonGen databases. Lockwood Corporation was listed on the UST, FINDS, and Integrated Compliance Information System (ICIS) databases.

Argomac-Lockwood began participation in the CORRACTS program in 1985. In 1992, stabilization measures were evaluated and implemented. The construction was completed in May 1993. In 1999, corrective action responsibility was referred to a Non-RCRA Federal Authority. In 2003, human exposures were evaluated as under control and migration of contaminated groundwater was under control and remained within the existing area. Unspecified engineering control dating to September 1, 1985 and institutional controls dating to June 15, 2005. According to the EPA Envirofacts database, surface impoundment D83 was listed as Post-Closure Permitted and closed with waste in place on November 1, 2004.

Activities under CERCLA began in 1999. The facility underwent an EPA Removal Action from December 2000 to July 2001. An Integrated Removal Assessment and combined Preliminary Assessment was conducted from October 2001 through October 2002. Agromac-Lockwood underwent a Potentially Responsible Party Removal in October 2003. An Administrative Order on Consent was issued on December 17, 2003. The site was archived with a NFRAP status on November 30, 2006. According to the site contact, the fenced area adjoining the southwestern corner of the site was the CERCLA area.

Hazardous waste generators identified for the site were as follows:

- Agromac-Lockwood was a RCRA-TSDF under EPA ID NER000003798 with 11 RCRA violations from an inspection conducted in September 1997. The violations included land disposal restrictions (LDR). The violations were brought into compliance. The facility was listed as a RCRA-NonGen on January 10, 2005.
- Argomac-Lockwood was identified as a RCRA-TSDF and CORRACTS facility under EPA ID NED044101442. The facility reported generating caustic (D002) wastes and had generated the wastes as a RCRA-LQG since 1979. Thirty-one RCRA violations were reported and included violations for surface impoundments and a final civil judgment for imminent and substantial endangerment issues in 1990. The violations were brought into compliance.
- EPA Region 7 was a large quantity generator of D002 and D011 wastes under EPA ID NESFN073537, as part of the Removal Action. No RCRA violations were reported. Following completion of the removal activities, the site was reported as a RCRA-NonGen.

The LUST incident was listed as closed.

Agromac-Lockwood was listed on the National Pollutant Discharge Elimination System (NPDES) and Air permit databases. According to the EPA Envirofacts database, the facility's participation in the Airs program was permanently closed.

Lockwood Corporation was listed on the ICIS and FINDS databases due to participation in the NPDES program and having a civil judicial action. Lockwood was also identified as having a UST on the property. No further information regarding the tank was provided. The D Street location of Lockwood adjoins the southwestern corner of the site and was listed on the FINDS database due to participation in the Hazardous Waste Program and the Nebraska Integrated Compliance System.

Descriptions of the databases searched and acronyms are provided in the complete database report presented in Appendix F. The following additional facilities were found within the ASTM E 1527-05 search radii:

Property	Database	Distance/Orientation from Subject Site	Environmental Concern/Reason
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Property	Database	Distance/Orientation from Subject Site	Environmental Concern/Reason
Progress Rail Services Corporation, 130824 Lockwood Road	RCRA-SQG	Adjacent to the northwest	The facility began reporting hazardous waste generating activities in 2008. Ignitable (D001), tetrachloroethylene (D039), trichloroethylene (D040), and spent halogenated solvent (F001) waste were reported. The facility has three RCRA violations that were brought into compliance.
Magnolia Homes and Guerdon Industries, 982 Rundell Road	RCRA-NonGen, LUST, and UST	Adjacent to the west	The facility was listed as a RCRA-NonGen in 2007 and no RCRA violations were reported. The facility has an open LUST incident that was in active investigation or remediation.
Pappas Trucking and Scotts Bluff County Highway Department, 785 Rundell Road	LUST and RCRA-NonGen	1,239 feet to the west-southwest	The LUST incident was closed with a No Further Action. The facility was a verified RCRA-NonGen in 2006 and violations were reported. Based upon the status and location of the facility, the potential for having impacted the subject site appears low.
Western Truck Service, 1061 Rundell Road	LUST and UST	1,051 feet to the west	The LUST incident was closed with a No Further Action. The UST was listed as permanently out of use. Based upon the status and location of the facility, the potential for having impacted the subject site appears low.
Gering Ft Laramie Irrigation District, 1011 Rundell Road	UST	1,056 feet to the west-southwest	The facility was inspected and a verified RCRA-NonGen 2006. No releases were reported. Based upon the lack of reported releases, the potential for this facility to have impacted the subject site appears low.
Western Ranch Products, 780 Rundell Road	RCRA-NonGen and UST	EDR mapped this facility 1,239 feet to the west-southwest; however, site reconnaissance places the facility on the southwest of the site across the railroad tracks.	The facility was listed as a RCRA-NonGen in 2002. No releases were identified for the UST. Based upon the lack of reported releases and location, the potential for this facility to have impacted the subject site appears low.

Property	Database	Distance/Orientation from Subject Site	Environmental Concern/Reason
Masek Rocky Mountain Kawasaki, 1200 Rundell Road	RCRA-NonGen	1,228 feet to the west-northwest	The facility was listed as a RCRA-NonGen in 1985; however, the facility was also identified as generating D001 waste. The facility may have been a RCRA-CESQG. No RCA violations were reported. Based upon the facility status and location, the potential for having impacted the subject site appears low.
Safety Kleen, 220379 Sunset Drive	CORRACTS	3,377 feet to the south	This facility was not located in an area considered upgradient to the subject site.

EDR identified one LUST, one LAST, three UST, one SPILLS, , tow FINDS, and one ICIS facilities/incidents as unmappable. The FINDS, ICIS, and UST database listings for Lockwood Corporation were discussed above. Based upon partial street addresses and site reconnaissance, the remaining facilities/incidents did not appear to be located in the vicinity of the subject site.

4.2 MUNICIPAL AND LOCAL AUTHORITIES

URS contacted the City of Gering Fire Department regarding prior use and potential spill and fire responses at the site. No information has been received to date.

URS accessed the Scotts Bluff County Tax Assessor's online property records website for information about the subject site. The subject site was identified as 010229760 and was owned by Beitel Enterprises Inc. The office building and a light industrial building were listed as constructed in 1980 with additions made to buildings in 2007 and 2008. Agromac International Inc. was listed as the site owner from 1998-2006. ATR purchased the site in 2007 and sold the site to Beitel Enterprises in 2011. The legal description is LT 2, AGROMAC, SUBD.

4.3 USER PROVIDED INFORMATION**4.3.1 Specialized Knowledge**

The site contact provided URS with access and detailed information regarding the activities conducted on the site. A copy of a prior environmental report prepared by Panhandle Geotechnical & Environmental, Inc. (PG&E) for ATR in February 2007 was provided to URS for review. This report is discussed in Section 3.6 and is provided in Appendix E.

A copy of the AAI questionnaire has not been returned to URS to date.

4.3.2 Valuation Reduction for Environmental Issues

No valuation reductions for environmental issues were identified by the client.

4.3.3 Owner, Property Manager, and Occupant Information

According to the Scotts Bluff Tax Assessor's Office, Beitel Enterprises Inc. owned the site.

According to Graham-White Manager Dan Hughes, Graham-White owns 60% of the site. G-W ATR operates a locomotive engine remanufacturing facility on the site. Some G-W ATR documents also refer to the facility as Omega.

4.3.4 Reason for Performing Phase I

The Phase I ESA is being conducted as part of environmental due diligence prior to property transfer.

4.4 ENVIRONMENTAL LIENS/ACTIVITY USE LIMITATIONS

The subject site was part of a larger facility operated by Agromac-Lockwood. The facility underwent corrective action under the RCRA and CERCLA programs. Information obtained to date indicated that the activities included the subject site and the north and southwest adjacent properties. Seven groundwater monitoring wells remained on the site in 2011 and were no longer sampled. The subject site has a Declaration of Restrictive Covenants for Environmental Protection issued by EPA that prohibits residential use of the site. A copy of these documents is provided in the 2007 Phase I ESA report by PG&E in Appendix E.

5.0 ON-SITE ENVIRONMENTAL ASSESSMENT

URS conducted the site reconnaissance on December 5, 2011. The weather was clear; and surfaces had a dusting of snow. On-site environmental concerns are discussed in the following subsections.

5.1 STORAGE TANKS

URS observed no USTs or evidence of USTs during the site inspection. A 1,000-gallon UST was understood by the site contact to have been removed during the Superfund cleanup of the site. No records of the UST or its removal were available from the site contact.

URS observed a 500-gallon gasoline AST situated on a concrete pad with secondary containment south of the building. The tank had a single steel wall. No visible evidence of staining or releases was observed.

A 1,000-gallon propane tank was located to the east of the gasoline AST and containment area.

An empty 10,000-gallon steel AST was located south of the building. The tank was previously contained sulfuric acid and was reportedly cleaned and purchased from the prior site occupant. The tank was no longer positioned in its original location.

In addition to gasoline, the site stores used oil from equipment testing in 250-gallon totes south of the building. The totes were staged in an unpaved fenced area with containment provided by a low berm and a sump that did not have a drain. The oil is used on site for fuel in the oil burners.

The volume of used oil in thirteen 250-gallon totes, new oil in twenty 55-gallon drums of new oil, and the 500-gallon gasoline AST is 4,850 gallons in containers 55-gallons and greater. This volume exceeded the 1,320-gallon threshold requiring a Spill Prevention, Control, and Countermeasure (SPCC) Plan. The site has a contingency plan; however, specific criteria required by SPCC regulations were not included. A copy of the Contingency Plan and Emergency Procedures is provided in Appendix H.

5.2 CHEMICAL SUBSTANCES AND PETROLEUM PRODUCTS

Chemical and petroleum substances are stored in the small parts area, used in the plant area, refrigeration area, battery reclaim area, engine area, evaporator room, saw mill room, and the outside hazardous materials storage area. The following chemicals were observed:

Area	Chemicals and Petroleum Products	Observations/Comments
Small Parts	An acetylene cylinder; an oxygen cylinder; two carbon dioxide cylinders; a 250-gallon tote of used oil, and a flammable materials cabinet containing spray paints, caulking, glues, cements, adhesives, and a small quantity of hydraulic oil.	Used oil was used in the oil burner in this area of the building. URS observed oil stains covered with absorbent on the floor beneath the used oil tote. The spills appeared to be related to the connections to the burner. The welding cylinders were positioned in a locked and upright position.
Refrigeration	Small quantities of spray lubricant; compressor oil; 25-gallon container of used oil, four 30-pound Freon canisters, four gallons of coil flush cleaners; two-gallons of refrigeration lubricant; an acetylene cylinder, an oxygen cylinder, and a nitrogen cylinder; recovered Freon in a 50-pound, 47-pound, and 26-pound containers, and a 50-pound mixed Freon container	The welding cylinders were positioned in a locked and upright position. The recovered Freon was owned by a client and was stored for use in the client's refrigeration equipment.
Battery Reclaim	20 large batteries and an argon/oxygen cylinder.	The batteries were staged on pallets and no evidence of a release was observed.
Power Assembly	14 five-gallon containers of compressor oil and several cans of spray paint	Compressor oil was used in parts testing and was reused as needed.
Engine	A 55-gallon drum of paint waste; 250-gallon tote of used oil, and a flammable materials cabinet containing oil stabilizer, spray paints, three-gallons of paint thinner, and a small quantity of oils, fluids, and adhesives.	Used oil was used in the oil burner in this area of the building.
Evaporator	Two 55-gallon drums of Stoddard solvent; a 55-gallon drum of engine oil; smaller containers of oils, and a flammable materials cabinet containing approximately 162 -cans of spray paint, 10-gallons of paint activator, 11 one-gallon cans of paint, and several small containers of lubricant and oils	Secondary containment was used for open containers in this area of the building.
Saw Mill	Eighteen five-gallon containers of paint	None
Welding	One acetylene cylinder, one oxygen cylinder, and three carbon dioxide cylinders	The welding cylinders were positioned in a locked and upright position.
Exterior Gas Storage	Fifteen carbon dioxide cylinders and three oxygen cylinders	The welding cylinders were positioned in a locked and upright position.
Exterior Hazard Materials Storage	Thirteen 250-gallon totes of used oil and twenty 55-gallon drums of new oil	Stored as described in Section 5.1. Used oil is burned in two oil burners in the building.
Adjacent to the Hazardous Materials	Twelve 55-gal drums of used evaporator sludge	Stored on pallets in an unpaved area. No stains were observed; however observations were limited by the

Storage Area		presence of snow.
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The weight of sulfuric acid stored in the used batteries stored in the battery reclaim area appeared to exceed the 500-pound Tier II reporting threshold for sulfuric acid. A Tier II report was not identified for the site.

Material Safety Data Sheets (MSDS) are in the employee break kitchen.

5.3 SOLID WASTE DISPOSAL

The subject site generates used packaging, waste paper, general trash, wooden pallets, scrap metal, used oil, oily rags, used oil filters, used tires, used batteries, used Freon, used paint cans, and evaporator sludge. Wastes are managed as follows:

Waste	Management Practice	Disposer/Recycler
Trash	Four dumpster and one compactor	Waste Management
Cardboard	Baled	Dow-Shred
Scrap metal	Staged in bins	Jon Salvage
Wooden pallets	Stored to the west of the building and re-used until broken then disposed in the trash	Waste management
Used oil	Oil is used in the testing of parts and components, Following parts testing, the used oil is stored in 250-gallon totes south of the building	Burned in two oil burners in the warehouse
Used oil filters	Emptied into used oil containers, then disposed in trash	Waste Management
Oily rags	Stored in containers and laundered off-site	Ideal Linens
Used tires	Stored in the building and periodically sent off-site for disposal	Nebraskaland Tires
Used Batteries	Used batteries are stored in the battery reclaiming areas for clients and batteries that cannot be recharged are recycled	Napa
Used Freon	Stored in a canister in the refrigeration area.	Between three and four pounds per month are return to the vendor
Used paint cans	Used paint cans are punctured and stored in a 55-gallon drum in the engine room.	Waste Management
Evaporator sludge	Evaporator sludge is stored in 55-gallon drums south of the building.	Waste Management

The evaporator sludge was analyzed for characteristics of hazardous waste in March 2011 by ESC Lab Sciences. No characteristics of hazardous waste were identified. A copy of this analysis is provided in Appendix G.

No evidence of illegal dumping or disposal was observed.

5.4 HAZARDOUS WASTE

The subject site was not listed on RCRA databases searched by EDR under the current operator's name, and the address was not listed on environmental databases. The site has two parts washers that use Stoddard Solvent. According to the site contact, no disposal from the parts washers has occurred and the majority of the solvent evaporates during the washing. A 55-gallon drum of spray paint cans was stored in the engine area and would be expected to require disposal as a hazardous waste; however, if the spray top is removed the material is not considered a hazardous waste.

5.5 POLYCHLORINATED BIPHENYLS (PCB)

URS observed a set of three platform-mounted transformers were located in a fenced area to east of the building. The transformers were owned by the City of Gering. URS observed some rust on the units; however, no visible evidence of a stain or release was identified. The PCB content of the transformers was not labeled. Any spills or releases from the transformers would be the responsibility of the utility.

5.6 WATER AND WASTEWATER/STORM WATER

Water and wastewater services are provided by the City of Gering. The subject site generates sanitary wastewater from restrooms and a break kitchen, which is discharged to the sanitary sewer system.

Contact wastewater from the wash bay flows to a trench drain and then enters a sump in the evaporator room. The water is then pumped to the evaporator. The resulting evaporator sludge is stored in drums as non-hazardous waste and shipped off-site for disposal. The wash water was analyzed for characteristics of hazardous waste in March 2011 by ESC Lab Sciences. No characteristics of hazardous waste were identified. A copy of this analysis is provided in Appendix G. The resulting evaporator sludge is disposed as a non-hazardous waste as described in Section 5.3.

Stormwater from the site flows to drainage ditches. A concrete sump covered in metal was used for stormwater containment of the used oil and new oil storage area. Water from this pit is pumped to the evaporator.

The subject site was operated as a railroad equipment repair facility and appears to meet the criteria for Standard Industrial Classification (SIC) code 3743 for railroad equipment. Facilities under this SIC code in Nebraska are covered under the NPDES rules for industrial stormwater and a NPDES permit and Stormwater Pollution Prevention Plan (SWPPP) would be required.

5.7 WETLANDS

The National Wetland Inventory (NWI) map accessed electronically by EDR did not depict wetlands at the site. URS did not observe any wetland-type vegetation on site.

5.8 LEAD-BASED PAINT

Based on the reported date of construction of the subject buildings (early 1970s), lead-based paints may have been used in the construction and subsequent painting of the building. All of the painted surfaces observed appeared to be in good condition.

5.9 ASBESTOS-CONTAINING MATERIALS (ACMS)

Based on the reported date of construction of the subject buildings, ACMs may have been used in the building. Potential sources of ACMs include drywall mud and tape, vinyl floor tiles and associated mastic, ceiling tiles, and roofing sealants and adhesives in the office area of the building. An asbestos survey has not been identified for the building.

5.10 RADON

According to information provided by EDR, Scotts Bluff, Nebraska is located in EPA Zone 2, where average indoor radon levels are predicted to be between 2 and 4 pCi/L. Twenty-nine facilities were tested for radon in the subject site zip code. The average activity for the living area was 2.508 pCi/L for the first floor living areas and 4.390 pCi/L for basement areas. The subject site does not have a basement and is not used for residential purposes. Site-specific testing would be required to determine the levels present at the subject site.

5.11 AIR EMISSIONS

The subject site has two small $\frac{3}{4}$ enclosed paint booths in the warehouse. One was located in the small parts assembly area, and the other was located in the engine area. The paint booths vent to the outside of the building. Other potential sources for emissions include the evaporator and the two oil burners in the building. The site does not have an air permit and no information regarding evaluation of the need for an air permit was identified.

5.12 OTHER OBSERVATIONS

No visible evidence of water damage or mold was observed.

Dirt piles located on the south side of the site were reportedly from other areas of the site and used for grading activities on the site.

5.13 CURRENT USES OF ADJOINING PROPERTIES

The subject site is located in a light industrial and commercial area of Gering, Nebraska.

The adjacent properties were identified as follows:

- North: Progress Rail Services (130824 Lockwood Road) and Agromac (220759 Highway 92). The subject site was part of a larger Agromac property from at least 1979-2005 and the environmental database listings for the subject site may extend to the north adjacent property. These listings were discussed in Sections 3.6 and 4.1. Progress Rail Services was listed on the RCRA-SQG database.
- East: La Plata Tortilleria (130854 Lockwood Road) and vacant land, followed by Lockwood Road then residences and a grain company named West Plains Company (130853 Lockwood Road)
- South: Gering Irrigation Ditch, followed by D Street, CS Precision (190028 Lockwood Road)
- Southwest: Former CERCLIS site comprised of 1.19 acres enclosed by a fence and vegetated in grass. The area was closed with an NFRAP status in 2005.
- West: Terry Jensen Construction and Quality Irrigation Service (850 Rundell Road) and a mineral feed supplement company named Furst McNess (780 Rundell Road). The 780 Rundell Road property was identified on the RCRA-NonGen and UST databases.

Northwest: A substation for the City of Gering, Agromac and Progress Rail property, followed by rail road tracks then Magnolia Homes (982 Rundell Road). The 982 Rundell address is listed on the RCRA-NonGen, LUST, and UST databases with an active LUST incident.

6.0 SAFETY

The site is 60% owned by G-W and is operated in conjunction with Beitel Enterprises. G-W ATR follows safety procedures established for ATR in 2007. URS was provided with a copy of the Workplace Safety and Reporting Policy and the Personal Protective Equipment (PPE) Policy, Which are provided in Appendix J.

Site specific information and observations regarding the site is provided below:

Program	Shreveport Site (Graham-White Central Remanufacturing Facility)
Hazard Communication Program	A hazard communication board is posted in the employee break room. Hazard communication is conducted through weekly safety meetings.
MSDS	MSDS are available for viewing on the site and are maintained in the break room
Personal Protective Equipment	The site required safety glasses, steel toed boots, ear plugs and hard hats in the production areas of the building. Specific tasks are identified as requiring additional PPE. The PPE assessment provided by G-W for the ATR facility was incomplete
Respiratory Protection Program	Approved breathing apparatus are required for painting and welding in the building. A copy of air monitoring data is provided in Appendix J. An exposure assessment was conducted.
Noise Program	URS observed hearing protection in use in the building. According to the site contact, noise surveys have been conducted. URS has requested a copy of the documentation; which has not been received to date.

7.0 CONCLUSIONS

URS has chosen an appropriate level of effort consistent with the ASTM E 1527-05 for evaluating the status of the property. The following table provides a summary of findings for the site:

Issue Type	Issue	Recommendations	Estimated Risk Level (Dollars)
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RECs	<p>The subject site is located on land that was part of the Agromac-Lockwood Superfund removal activity and CORRACTS. Activities under CERCLA and CORRACTS were closed with a NFRAP on November 30, 2006. Operations on the site included galvanizing and pickling by Lockwood, Agromac, and Powerhorse Lockwood. Acids, metals, and solvents were used on the site. The residual concentrations were reported to be above background level in 2004; however, the concentrations were not available in on-line resources. Arsenic and manganese exceeded their respective MCL and PRG in groundwater.</p> <p>Agromac-Lockwood is identified as the responsible party for prior environmental waste on the site. However, without a thorough understanding of the areas of historic site use and residual concentrations in soil and groundwater, overlapping areas of impact and use in the event of a spill or a re-opened Superfund investigation could involve the subject site owners and operators as potentially responsible parties.</p>	Conduct a file review to obtain mapped locations and descriptions of the extent of remediation conducted, areas impacted, and residual contamination levels on the subject site so that potential overlapping areas of use or potential contaminants can be identified.	>1,000,000
	<p>A LUST incident was reported to be closed and the UST removed; however, the location of the tank and residual contamination levels were not available from on-line resources or the subject site. There is a potential for overlap between oil and fuel storage areas currently used by the site and the former UST location.</p>	URS recommends a file review be completed for this tank and the former location and soil and groundwater conditions at the time of removal be documented.	100,000-1,000,000
	<p>The subject site has a Declaration of Restrictive Covenants for Environmental Protection issued by EPA that prohibits residential use of the site.</p> <p>The site was not located in an area where the use of the site for residential purposes appears likely.</p>	None	<100,000
Off-Site REC	An open LUST incident is undergoing remediation on the northwest adjacent property.	None	<100,000
Potential Environmental Compliance Issues	The subject site had approximately 4,850 gallons of petroleum products stored in containers 55-gallons and larger and exceeded the 1,320-gallon threshold requiring an SPCC plan. A Contingency Plan was identified for the site; however,	URS recommends an SPCC Plan be prepared and implemented for the site	<100,000

	some elements specified by SPCC regulations were not included in the Contingency Plan.		
	The site does not have a Nebraska Pollutant Discharge and Elimination System (NPDES) permit for stormwater. G-W ATR conducts operations identified as SIC code 3743 for railroad equipment. Facilities under this SIC code are required to have an NPDES permit. In addition to an NPDES permit, the site will require a stormwater pollution prevention plan (SWPPP) to manage stormwater discharges from the site.	URS recommends the site apply for an NPDES permit and draft and implement a SWPPP.	<100,000
	An evaporator, two small paint booths, and two oil burners were operated on the site, and evaporation of Stoddard solvent was identified during site processes. The site does not have an air permit and the potential need for an air permit had not been evaluated.	URS recommends the facility be evaluated for the applicability of an air permit for emissions	<100,000
	The site was not identified as a RCRA generator of hazardous waste. Parts washers used Stoddard solvent that reportedly evaporates through use and has not required disposal.	The site should manage parts washers to reduce evaporation.	<100,000
Potential Environmental Business Risks	Based upon the date of construction, there is a potential for asbestos and lead-based paint to have been used in the building. No sampling has been identified for the building interiors, piping, and roofing materials.	Sampling should be conducted prior to any renovation or demolition in the building. An operation and maintenance (O&M) plan should be developed and maintained by the site. This document can be used to track areas sampled, results of the sampling, and areas where sampling and abatement have occurred.	<100,000
	URS observed twelve 55-gallon drums of evaporator sludge (characterized by analysis as non-hazardous waste) staged on pallets in an unpaved area outside of the building.	URS recommends an impermeable surface be used for the storage area, to reduce the risk of impacts from small spills.	<100,000
	A sump was used for the management of stormwater from the oil storage area outside of the building. The sump could not be inspected.	URS recommends the containment be inspected.	<100,000

	URS observed oil stains beneath the oil totes connected to the oil burners. Absorbents were used to dry the spills.	URS recommends using secondary containment for the totes connected to the oil burners to contain spills.	<100,000
Safety	The site uses safety policies implemented for ATR prior to partnership with G-W. Copies of the Workplace Safety and Reporting and Personal Protective Equipment Policies were provided to URS. The site holds weekly safety meetings.	URS recommends the safety policies used by G-W ATR be reviewed for consistency with G-W policies.	<100,000
	Material Safety Data Sheets (MSDS) are available in the employee break area.	None	<100,000
	The site required safety glasses, steel toed boots, ear plugs and hard hats in the production areas of the building. Specific tasks are identified as requiring additional PPE. URS observed limited use of hard hats in the building. The PPE assessment provided by G-W for the ATR facility was incomplete.	URS recommends the PPE Assessment for G-W be expanded to include all areas of the G-W ATR facility and a review be conducted to determine if additional assessment is required to include improved delineation of hard hat areas.	<100,000
	Approved breathing apparatus are required for painting and welding in the building. Air monitoring has been conducted in the building; however, an exposure assessment has not been conducted	URS recommends an exposure assessment be considered for workers on the site.	<100,000
	URS observed hearing protection in use in the building. According to the site contact, a noise survey had been conducted at the site. However, a copy of the survey has not been provided to date	URS recommends a noise survey be conducted if a prior study cannot be located.	<100,000

8.0 REFERENCES

Field Investigator: Vanessa Scott – URS – Denver, Colorado

Report Writer: Ann Jarboe – URS – Cincinnati, Ohio

Senior Reviewer: Donald Brice, C.P.G. – URS – Cincinnati, Ohio

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United States Geological Survey (USGS), 2011. *A Tapestry of Time and Terrain: Physiographic Provinces of the United States*. USGS; web-page as viewed 12/5/11. <http://tapestry.usgs.gov/physiogr/physio.html>.

United States Geological Survey (USGS), 1963; photo-revised, 1976. *7.5-minute Topographic Quadrangle Map of Scottsbluff South, Nebraska*. USGS; Reston, Virginia.

PROFESSIONAL QUALIFICATIONS

Scott E. Perkins, P.E. - Senior Consultant

Registrations

Professional Engineer Virginia No. 0402 038504
Professional Engineer West Virginia No. 16075

Fields of Expertise

Project Management
Environmental Regulations (RCRA/CERCLA/NEPA/CWA/SDWA/EPCRA/FIFRA/TSCA)
Environmental Liability Identification and Management in Real Estate and Corporate Mergers/Acquisitions
Web-Based Technology for Environmental Management and Compliance
Contaminated Site Assessment and Corrective Action
Environmental Program Development and Environmental Management Systems (including ISO 14001)
Virginia Voluntary Remediation Program
Stormwater Management and Erosion Control
Environmental Response and Remediation
Drinking Water and Wastewater Systems Monitoring and Management

Experience Summary

Mr. Perkins is a registered Professional Engineer in Virginia and West Virginia. He has over 21 years of experience in numerous facets of environmental engineering and consulting. He has provided expert witness testimony in significant and complex civil and criminal cases and negotiated on behalf of clients with state and federal authorities faced with civil and criminal charges. He has managed numerous regulatory compliance audits, contaminated site assessments and cleanups, environmental engineering studies and other environmental projects. He routinely aids clients in identifying environmental liabilities and developing and implementing cost effective and practical solutions. He has assisted dozens of organizations with developing and implementing Environmental Management Systems under the ISO 14001 standard. Mr. Perkins has developed and implemented large-scale multi-media monitoring programs and evaluated industrial and municipal wastewater treatment systems and potable water treatment and distribution systems. He has led the development of several large-scale environmental management programs for clients and has developed stormwater management programs for industrial, municipal and military clients. Mr. Perkins has extensive experience negotiating with federal, state and local regulatory agencies and has made presentations at numerous public meetings on behalf of clients.

Education/Credentials

M.S. Civil/Environmental Engineering, University of Colorado, 1994
B.S.E. Civil/Environmental Engineering, Duke University, 1990 (graduation with distinction)
ISO 14000 Lead Auditor Training
Attended and participated in numerous federal, state, and private seminars to update various environmental regulatory programs

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PROFESSIONAL QUALIFICATIONS - CONTINUED

Scott E. Perkins, P.E. - Senior Consultant

Key Projects

Environmental Risk Management

Identified corporate environmental liabilities, including quantification and proposed resolutions, in merger of two large national heavy industrial corporations.

Provided liability quantification services to a regional corporation expanding their area of service.

Evaluated overall performance of a large national retail corporation's environmental program with an emphasis on risk management and allocation of resources.

RCRA

Supervised regulatory compliance aspects of the operations and maintenance of a large federally-owned, RCRA-regulated wastepile and an inactive surface impoundment. Participated in developing the closure design for both the wastepile and the surface impoundment and negotiated on behalf of client with regulators to obtain favorable closure criteria.

Conducted over 75 RCRA compliance audits at federal facilities around the U.S. Assisted facilities with developing and implementing response action plans to address non-conformances.

Developed and submitted RCRA Annual TSDF and RCRA Biennial Reports for a major federal facility over a 5-year period.

Conducted RCRA training seminars across the U.S. for hazardous waste generators and RCRA-permitted facilities.

Developed programmatic approach for site remediation and closure at a major federal RCRA-permitted facility. Approach balanced various land-use scenarios with cost and technical considerations.

Managed the full evaluation of a major urban government's wastestream classification program.

A leader in the application of RCRA requirements to organizations with ordnance and explosives issues.

CERCLA

Provided project management-level oversight for over 50 remedy implementation projects at a major cleanup site under CERCLA.

Facilitated interaction with the public and with regulatory agencies at a multi-billion dollar CERCLA cleanup.

Project manager for several CERCLA response actions.

Managed a multi-party CERCLA 5-year review project. Team included 20 stakeholders consisting of site managers and regulators.

Drinking Water and Wastewater Systems Management

Conducted compliance and operational/design assessments and design reviews at potable drinking water, municipal wastewater, and industrial wastewater systems across the country.

Project manager tasked with evaluating and re-engineering municipal reverse osmosis drinking water system confronted with significant lead levels. Successfully brought system into full compliance with the USEPA's Lead and Copper Rule by achieving an 80% reduction in dissolved lead levels.

Developed and managed program evaluating potable water supplies at U.S. research stations throughout Antarctica.

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PROFESSIONAL QUALIFICATIONS - CONTINUED

Scott E. Perkins, P.E. - Senior Consultant

Environmental Program Development and Management

Developed and implemented an environmental management program at one of the largest environmental cleanup sites in the country. Included were an environmental compliance intranet site, intensive inspection program, and various web-based databases facilitating compliance and project management.

Led the design and implementation of a multi-media environmental monitoring program targeting the nation's impacts on Antarctica. This was followed by the subsequent hiring of a team of field specialists to cleanup sites with significant contaminant levels.

Assisted large federal and municipal organizations with developing and implementing ISO 14001-compliant Environmental Management Systems.

Managed the development and oversaw the implementation of a complex database to track material throughput and waste disposal at a major federal facility tasked by the Department of Defense with chemical agent disposal testing.

Other

Led the development of Internet-based environmental management systems and virtual data rooms for industrial, federal and municipal clients.

Conducted numerous environmental assessments under the National Environmental Policy Act (NEPA).

Conducted numerous Phase I and Phase II Environmental Site Assessments in compliance with ASTM protocols.

Trained environmental Emergency Response Teams across the country.

Performed EPCRA reporting for large facilities.

Publications & Presentations

Perkins, S., Davis, J., Schmuck, J., Eason, S., "Ordnance and Explosives Emergency Response at a CERCLA Site, an Environmental Compliance Perspective," *Federal Facilities Environmental Journal* (Summer 2002).

Perkins, S., Schmuck, J., "Risk-Based Approach to Documenting Agent Decontamination Levels in Soil and Structural Debris," presented at the West Coast Contaminated Soils Conference, San Diego, CA (April 2003).

Perkins, S., Davis, J., Schmuck, J., Eason, S., "Ordnance and Explosives Emergency Response at a CERCLA Site," published in the proceedings of the National Defense Industrial Association 28th Environmental Symposium and Exhibition, Charleston, SC (April 2002).

Perkins, S., Snowwhite, L., "The CERCLA Five-Year Review Process - Lessons Learned at Rocky Mountain Arsenal," *Federal Facilities Environmental Journal* (Autumn 2001).

Perkins, S., "The Logistical Challenge of Evaluating a Complex Environmental Cleanup Site - Rocky Mountain Arsenal's First CERCLA Five-Year Review," published in the proceedings of the Fourth Tri-Service Environmental Technology Symposium, San Diego, CA (June 2001).

Perkins, S., "Rocky Mountain Arsenal's First CERCLA Five-Year Review - Lessons Learned," published in the proceedings of the National Defense Industrial Association 27th Environmental Symposium and Exhibition, Austin, TX (April 2001).

Perkins, S., Graber, C., "Mitigation of Elevated Lead Levels in Drinking Water at McMurdo Station, Antarctica," *Federal Facilities Environmental Journal* (Spring 2001).

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PROFESSIONAL QUALIFICATIONS - CONTINUED

Scott E. Perkins, P.E. - Senior Consultant

Perkins, S., Huttenga, A., et al., "Web-Based Tools for Environmental Management," Federal Facilities Environmental Journal (Spring 2000).

Perkins, S., "Automating the Management of Environmental Compliance Reporting: Making the Complex Simple," published in the proceedings of the National Defense Industrial Association 26th Environmental Symposium and Exhibition, Long Beach, CA (March 2000).

Perkins, S., Smith, K., Whorton, M., Williams, G., "Managing Environmental Information in the Age of Outsourcing," published in the proceedings of the National Defense Industrial Association 25th Environmental Symposium and Exhibition, Denver, CO (March 1999).

Perkins, S., "Environmental Monitoring in Antarctica," published in the proceedings of the 4th International Conference for On Site Analysis, Orlando, FL (January 1996).

Perkins, S., Mikesell, D., "Screening Contaminated Samples for Petroleum Contamination Using Semi-Quantitative Enzyme Immunoassay Technology," published in the proceedings of the 4th International Conference for On Site Analysis, Orlando, FL (January 1996).

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PROFESSIONAL QUALIFICATIONS

Robert W. List – Senior Consultant

Fields of Expertise

Project Management
Construction & Remediation Management
Phase 1 and Phase 2 Facility Assessments
Human Health Risk Assessments
Soil and Groundwater Investigation/Remediation
Development of Technical Work Plans, Remedial Plans Closure Reports, Facility Characterizations Plans
RCRA Corrective Action and Closure
Regulatory Compliance
Facility Audits
EPA and VDEQ Solid and Hazardous Waste Regulations
Virginia Voluntary Remediation Program
Underground Storage Tank Program
State Contract Management

Experience Summary

Mr. List has more than 20 years experience in the field of environmental consulting. Mr. List's area of expertise includes managing the environmental aspects of property development/re-development, real estate transactions, site remediation oversight and risk assessments. He has acted as senior project manager on numerous soil and groundwater investigations at industrial, manufacturing and solid-waste facilities throughout the United States. Mr. List is a member of the 10-person Technical Advisory Committee formed by the Virginia Department of Environmental Quality to assist with drafting revisions to the Voluntary Remediation Program regulations. In addition, Mr. List has extensive experience with lead contaminated sites and in-situ remediation/stabilization. These facilities include scrap and salvage yards, gun ranges and manufacturing facilities.

Mr. List previously served as a Corrective Action Coordinator for the Texas Commission on Environmental Quality (TCEQ) where he was responsible for evaluating site assessment, risk assessment and remedial action plans for compliance with state requirements. His experience includes the oversight of the decommissioning, removal and in-situ closure of numerous USTs and ASTs, facility audits, corrective action, hazardous waste characterization, remediation, and closure. Mr. List also has significant experience in project administration and management, construction oversight and negotiating with federal, state and local regulatory agencies on behalf of the client.

Education/Credentials

B.S. Geology, Baylor University, Waco, TX, 1984
OSHA 40-Hour Hazardous Waste Site Training
Member of VDEQ VRP Technical Advisory Committee
Corrective Action Project Manager
Assessment and Management of MTBE Impacted Sites, NGWA Short Course 1999

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PROFESSIONAL QUALIFICATIONS - CONTINUED

Robert W. List - Senior Consultant

Leaking Underground Storage Tank Site Characterization Methods, EPA, 1995
Industry and Government Relations Committee Chairman, Industry Council on the Environment, 1997-2000

Key Projects

UST/AST and Petroleum Management

- **Tanker Truck Spill Site, Fincastle, VA:** Managed soil and groundwater characterization and risk assessment as a result of a diesel tanker truck spill along a major highway.
- **Star Enterprise, Inc./Equiva Services LLC Bulk Petroleum Terminal, San Antonio, TX:** Performed a comprehensive soil and groundwater investigation at a 100-acre facility. Additional activities included preparation and submittal of corrective action plans, installation and operation of a dual-phase remediation system and risk assessment reporting.
- **Tosco Marketing & 7-Eleven:** Managed assessment, remediation and closure of multiple UST facilities throughout Texas, Oklahoma and Arkansas. Activities included site characterization, risk assessment, corrective action plans, subcontractor management, data management, closure evaluation and regulatory reporting.
- **Texas Natural Resource Conservation Commission, TX:** Managed state-wide privatization contract pertaining to UST/AST site assessment, risk assessment, remediation, closure and administered UST Reimbursement Fund Program.
- **Koch Industries Asphalt Mixing Plant, Mt. Pleasant, TX:** Managed assessment, remediation, construction oversight, excavation and closure of petroleum-impacted ponds at an asphalt mixing plant. Activities included site characterization, risk assessment, corrective action plans, subcontractor management, data management, closure evaluation and regulatory reporting.
- **Amoco Refinery, Texas City, TX:** Performed comprehensive site investigation and groundwater characterization on multiple contaminant plumes at a major US refinery.

Voluntary Remediation Program

- **Former Old Salem Tannery Property:** Project manager for a large-scale re-development project on property formerly the location of tannery facility since the late 1800's.
- **Roanoke Redevelopment and Housing Authority:** Project manager for the re-development of commercial properties for use as single- and multi-family residential facilities.
- **The South Jefferson Redevelopment Project, Roanoke, VA:** Project manager for soil and groundwater investigation, risk assessment and remediation activities of five (5) former industrial properties to allow for redevelopment of a blighted 110-acre urban area. After completion of remedial activities, the land will be developed as a biomedical research and development facility.
- **The Mill at South River, Waynesboro, VA:** Managed all environmental aspects (site characterization, remediation, risk assessment and closure) of redevelopment and remediation of a large former textile manufacturing facility.
- **The Burruss Company, Lynchburg, VA:** Project oversight for soil and groundwater investigation, risk assessment, remedial evaluation and waste management activities at a wood product laminating operation and hardwood flooring manufacturer where PCP impacted soils and groundwater were determined to be present.

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PROFESSIONAL QUALIFICATIONS - CONTINUED

Robert W. List – Senior Consultant

- **Virginia Metals Industries Facility, Orange, VA:** Managed site characterization, risk assessment and remediation of lead impacted soil at a former metal plating, forming and machining facility occupying 53+ acres.
- **Carilion Health Systems, Roanoke, VA:** Managed site characterization and risk and remediation assessment activities during redevelopment of properties as part of the overall South Jefferson Redevelopment corridor.

RCRA/CERCLA/Superfund

- **Landfill Closures – Christiansburg and Gloucester, VA:** Conducted assessment monitoring statistical groundwater evaluations
- **Intermet Foundry, Pulaski County, VA:** Managed the characterization, remedial action plan preparation and removal of hazardous foundry waste containing cadmium and lead from a private solid waste facility
- **General Electric Railcar Services Corp., Ranger, TX:** Site manager for the stabilization and solidification of phenolic sludge and residue, and the construction of a permitted on-site landfill.
- **Lead Acid Battery Manufacturing Facility, Conyers, GA:** Managed in-situ stabilization of lead impacted soil followed by a soil removal action conducted under the Georgia HSRA Program. Developed and managed groundwater investigation strategy for large TCE plume.
- **Temple-Inland Forest Products, Diboll, TX:** Installed groundwater remediation system for the extraction of creosote; site manager for closure of hazardous waste management units and performed site-wide soil and groundwater investigations

Risk Assessment

- Prepared numerous quantitative human health risk assessments for industrial and commercial clients using USEPA RAGS and Virginia Voluntary Remediation Program Risk Assessment Guidance.
- While at the TCEQ, worked on the Texas UST RBCA development team

PROFESSIONAL QUALIFICATIONS

John P. O'Connor - Project Manager

Fields of Expertise

Project Management
Phase I Environmental Site Assessments
Phase II Environmental Site Assessments
Environmental Impact Reports
Virginia Voluntary Remediation Program
Soil and Groundwater Investigation/Remediation
Environmental Compliance
Regulatory Liaison
Regulatory Research
Contract Administration
Stormwater Management
Underground Storage Tank Program
Drinking Water and Wastewater Regulations

Experience Summary

Mr. O'Connor has more than 14 years of experience in the field of environmental consulting. Mr. O'Connor's areas of expertise include managing the environmental aspects of the due diligence process associated with real estate transactions, property re-development and site remediation. He has assisted municipal and industrial clients navigate and comply with complex air emissions-related regulatory requirements. Prior to joining Faulkner & Flynn, Mr. O'Connor was employed as an Environmental Scientist for a full service engineering, environmental and survey firm. He has served as a consultant to both industry and government on regulatory issues.

Credentials

B.S. Physical Science, Radford University, Radford, Virginia, 1996
HAZWOPER - 40 hour (29 CFR 1910.120), Confined Space Entry Operations (29 CFR 1910.146)

Key Projects

Phase I Environmental Site Assessments

- **28 American Tower Sites** - cell tower locations throughout Virginia.
- **Virginia Carolina Paving/Halifax Ready Mix Site** - Asphalt and concrete processing plant in South Boston, VA.
- **R&J Ranch and Resort, Inc.** - a 112 acre commercial resort and residential property in Carroll County, VA.
- **Crowgey, Albright and Bongard Law Office** - 1.25 acre lot with commercial office space in Christiansburg, VA.

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PROFESSIONAL QUALIFICATIONS (continued)

John P. O'Connor - Project Manager

- Eastham Tract - 122 acre agricultural site in Warren County, VA. Lea Industries Building - 20.97 acre parcel with 209,681 square foot industrial facility in Smyth County, VA.
- Lot 27, Proposed Retail Center - 1.035 acre undeveloped parcel proposed for construction in Christiansburg, VA.
- Halmode Plant - 13.7 acre parcel with approximately 250,000 square foot industrial facility in Roanoke, VA.
- Thomas Property - Approximately 0.48 acre parcel with an 8,000 square foot automotive maintenance facility in Vinton, VA.
- Berglund Chevrolet - 1.1 acre parcel used for retail motor fuel sales in Roanoke, VA.
- Ray's Refuse & Recycling - Commercial property used as temporary municipal solid waste transfer station and vehicle maintenance facility in Middle River, MD.
- Valley Rich Dairy - 5.2 acre parcel in Lynchburg, VA and 1.6 acre parcel in Bluefield, VA used as a storage facility and vehicle maintenance facility.
- Numerous residential properties across Virginia.

Phase II Environmental Site Assessments

- Thomas Property - Approximately 0.48 acre parcel with an 8,000 square foot automotive maintenance facility located in Vinton, VA.
- Virginia Panel Corporation - Manufacturing facility in Waynesboro, VA.
- Genicom Corporation - Manufacturing facility in Waynesboro, VA.
- Reeves Brothers Site - Former industrial facility located in Buena Vista, VA.
- Radford Army Ammunition Plant - Incineration facility located in Radford, VA.

Voluntary Remediation Program

- Former Old Salem Tannery Property - Assisted in the management of a large-scale re-development project on property formerly the location of a tannery facility since the late 1800s.
- Roanoke Redevelopment and Housing Authority - Assisted in the management of the re-development of commercial properties for use as single- and multi-family residential facilities.
- The South Jefferson Redevelopment Project, Roanoke, VA - Assisted in the management of a soil and groundwater investigation, risk assessment and remediation activities of five (5) former industrial properties to allow for redevelopment of a blighted 110-acre urban area. After completion of remedial activities, the land will be developed as a biomedical research and development facility.
- The Mill at South River, Waynesboro, VA - Assisted in the management of all environmental aspects (site characterization, remediation, risk assessment and closure) of redevelopment and remediation of a large former textile manufacturing facility.

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PROFESSIONAL QUALIFICATIONS (continued)

John P. O'Connor - Project Manager

Stormwater Management

- **Peters Mountain Landfill** - Provided stormwater management related training to key staff members of a municipal solid waste landfill located in Covington, VA.
- **Bedford County Landfill** - Provided stormwater management related training to key staff members of a municipal solid waste landfill located in Bedford, VA.
- **Rockbridge County Landfill** - Provided stormwater management related training to key staff members of a municipal solid waste landfill located in Alta Vista, VA.
- **City of Lynchburg Landfill** - Provided stormwater management related training to key staff members of a municipal solid waste landfill located in Lynchburg, VA.
- Numerous industrial facilities.

Air Compliance

- **PlyGem** - Provided air compliance related guidance to a nationwide supplier of building supplies located in Rocky Mount, VA.
- **County of Henrico** - Provided air compliance related guidance to the County of Henrico, VA.



Product Information



A PRODUCT OF THE VALVOLINE COMPANY A DIVISION OF ASHLAND INC.

TECTYL 506

Description

TECTYL 506 is a solvent cutback, wax base, general purpose, corrosion preventive compound. TECTYL 506 is excellent for long term protection of metallic surfaces against corrosion in either indoor or outdoor exposure and during domestic and international shipments, like machinery, machine rolls/tools, automatic parts, dies, tubing, and spare parts. TECTYL 506 cures to a dark amber colored, waxy, transparent, firm film.

Typical Properties

Flashpoint; PMCC	40	°C
Specific Gravity @ 60°F	0.87	kg/ltr
Recommended Dry Film Thickness	50	microns minimum
Theoretical Coverage @ Avg. Recommended DFT	9.2	m ² /l
Non Volatile	52	weight %
Viscosity; DIN (53 211) Cup No. 4 @ 20°C (at time of manufacture)	85	seconds

Dry to Touch Time @ 25°C	± 2	hours
Cure Time @ 25°C	± 24	hours
Volatile Organic Content (VOC) (ASTM D-3960)	415	g/l

Accelerated Corrosion Tests: @ Avg. Recommended DFT

Salt Spray; 5 % NaCl @ 35°C; DIN 50 021 (ASTM B-117) (DIN 1623 Steel Panels)	40+	days
Humidity; 100 % RH; @ 40°C; DIN 50 017-KK (DIN 1623 Steel Panels)	100+	days

This information only applies to products manufactured in the following location(s): Europe

Effective Date:	Replaces:	Author's Initials:	Pages	Code:
8-Aug-06	22-09-1999	JAvM	1/2	Tectyl 506 Doc

The information contained herein is correct to the best of our knowledge. The recommendations or suggestions contained in this bulletin are made without guarantee or representation as to results. We suggest that you evaluate these recommendations and suggestions in your own laboratory prior to use. Our responsibility for claims arising from breach of warranty, negligence or otherwise is limited to the purchase price of the material. Freedom to use any patent owned by Ashland or others is not to be inferred from any statement contained herein.



Product Information



A PRODUCT OF THE VALVOLINE COMPANY A DIVISION OF ASHLAND INC.

TECTYL 506

Surface Preparation:

The maximum performance of TECTYL 506 can be achieved only when the metal surfaces to be protected are clean, dry and free of rust, oil and mill scale. Valvoline recommends that the metal substrate temperature be 10-35 °C at the time of product application.

Application:

TECTYL 506 is formulated to be used as supplied. Ensure uniform consistency prior to use. Continued stirring is generally not required. If the product thickens due to cold storage or loss of solvent during use, contact Valvoline. DO NOT THIN TECTYL 506. Incorrect thinning will affect film build, dry time and product performance. Valvoline recommends that the ambient and product temperature be 10-35 °C at the time of product application. TECTYL 506 can be applied by airless spray or brush.

Removal:

TECTYL 506 can be removed with mineral spirits or any similar petroleum solvent, hot alkaline wash or low pressure steam.

Storage:

TECTYL 506 should be stored at temperatures between 10-35 °C. Mild agitation is recommended prior to use. Due to its composition TECTYL 506 can be subject to postproduction viscosity changes during storage.

Under proper storage conditions TECTYL 506 can have a shelf life of 3 years minimum.

Caution:

Adequate ventilation is required for cure and to ensure against formation of combustible liquid. THE PARTIALLY CURED FILM SHOULD NOT BE EXPOSED TO IGNITION SOURCES SUCH AS FLARES, FLAMES, SPARKS, EXCESSIVE HEAT OR TORCHES. Refer to Valvoline's Material Safety Data Sheet for additional handling and first aid information.

Note:

The addition of any product over or under this coating is not recommended. The use of additional coatings could result in chemical incompatibility, thus affecting the performance of this coating as stated in the Typical Properties section. If a primer, other than a Valvoline recommended product is required, written authorization must be obtained from Valvoline.

This information only applies to products manufactured in the following location(s): Europe

Effective Date:

8-Aug-06

Replaces:

22-09-1999

Author's Initials:

JAvM

Pages

2/2

Code:

Tectyl 506.Doc

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ZEP Inc.
11627 178th Street
Edmonton, Alberta T5S 1N6
1-877-4-BUY-ZEP (413-9937)
www.zep.com

Material Safety Data Sheet

Section 1. Chemical Product and Company Identification

Product name **DYNA 143**
Product use **Parts Cleaner**
Product code **0366**
Date of issue **10/25/13** Supersedes **11/08/10**

Emergency Telephone Numbers

For MSDS Information:
Technical Services Group
Telephone (780) 453-8100
(Business Hours 8:00am - 5:00pm)

For Medical or Transportation Emergency
CANUTEC (24 Hours)
(613) 996-6666 - Call Collect

Prepared By
Technical Services Group
11627 178th Street
Edmonton, Alberta T5S 1N6

Section 2. Hazards Identification

Emergency overview

CAUTION !

COMBUSTIBLE LIQUID AND VAPOR.

Combustible liquid. Keep away from heat, sparks and flame. Avoid breathing vapor or mist. Avoid contact with skin and clothing. Use only with adequate ventilation.

NOTE: MSDS data pertains to the product as delivered in the original shipping container(s). Risk of adverse effects are lessened by following all prescribed safety precautions, including the use of proper personal protective equipment.

Acute Effects

Routes of Entry

Eye contact, Skin, Inhalation.

- Eyes** May cause eye irritation. Inflammation of the eye is characterized by redness, watering and itching.
- Skin** May cause skin irritation. Skin inflammation is characterized by itching, scaling, or reddening.
- Inhalation** Harmful by inhalation. Over-exposure by inhalation may cause respiratory irritation. Can cause central nervous system (CNS) depression. Pre-existing respiratory disorders may be aggravated by over-exposure to this product.
- Ingestion** Aspiration hazard if swallowed. Can enter lungs and cause damage.

Chronic effects

Prolonged skin contact may cause dermatitis with drying and cracking of skin. Skin which is repeatedly defatted by contact with this product may be more susceptible to irritation, infection or dermatitis.

Additional Information: See Toxicological Information (Section 11)

Section 3. Composition/Information on Ingredients

Name of Hazardous Ingredients	CAS number	% by Weight
LIGHT ALIPHATIC NAPHTHA; solvent naphtha (petroleum), medium aliphatics	64742-88-7	60 - 100

Section 4. First Aid Measures

- Eye Contact** Immediately flush eyes with plenty of water, occasionally lifting the upper and lower eyelids. Check for and remove any contact lenses. Continue to rinse for at least 10 minutes. Get medical attention if irritation occurs.
- Skin Contact** Flush affected skin with plenty of water. Remove contaminated clothing and shoes. Get medical attention if symptoms occur. Wash clothing before reuse. Clean shoes thoroughly before reuse.
- Inhalation** Move exposed person to fresh air. If not breathing, if breathing is irregular or if respiratory arrest occurs, provide artificial respiration or oxygen by trained personnel. Get medical attention if adverse health effects persist or are severe.

Product code 0166	Material Safety Data Sheet	Product Name DYNA 143
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Ingestion If material has been swallowed and the exposed person is conscious, give small quantities of water to drink. Never give anything by mouth to an unconscious person. Do not induce vomiting unless directed to do so by medical personnel. If vomiting occurs, the head should be kept low so that vomit does not enter the lungs. Get immediate medical attention.

Section 5. Fire Fighting Measures

Flash Point Closed cup: 62°C (143.6°F)
[Pensky-Martens.]

Flammable Limits Lower: 1%
Upper: 7%

Flammability Combustible liquid.

Auto-ignition Temperature

Fire-Fighting Procedures Use dry chemical, CO₂, water spray (fog) or foam. Fire-fighters should wear appropriate protective equipment and self-contained breathing apparatus (SCBA) with a full face-piece operated in positive pressure mode.

Fire hazard Combustible liquid. In a fire or if heated, a pressure increase will occur and the container may burst, with the risk of a subsequent explosion. The vapor/gas is heavier than air and will spread along the ground. Vapors may accumulate in low or confined areas or travel a considerable distance to a source of ignition and flash back.

Products of Combustion May emit toxic fumes under fire conditions: carbon oxides (CO, CO₂)

Explosion hazard Not available.

Section 6. Accidental Release Measures

Spill Clean up Stop leak if without risk. Move containers from spill area. Dilute with water and mop up if water-soluble or absorb with an inert dry material and place in an appropriate waste disposal container. Use spark-proof tools and explosion-proof equipment. Dispose of via a licensed waste disposal contractor.

Section 7. Handling and Storage


Handling Put on appropriate personal protective equipment (see Section 8). Do not breathe vapor or mist. Do not ingest. Avoid contact with eyes, skin and clothing. Use only with adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Store and use away from heat, sparks, open flame or any other ignition source. Use explosion-proof electrical (ventilating, lighting and material handling) equipment. Use non-sparking tools. Take precautionary measures against electrostatic discharges. Do not reuse container. Wash thoroughly after handling.

Storage Do not store above the following temperature: 49°C (120°F). Store in a segregated and approved area. Store in original container protected from direct sunlight in a dry, cool and well-ventilated area, away from incompatible materials (see Section 10) and food and drink. Eliminate all ignition sources. Separate from oxidizing materials. Keep container tightly closed and sealed until ready for use. Do not store in unlabeled containers. Keep out of the reach of children.

Section 8. Exposure Controls/Personal Protection

Product name **Exposure limits**
No exposure limit value known.

Personal Protective Equipment (PPE)

Eyes Recommended: Splash goggles. 

Hands and Body Recommended: Neoprene gloves. Nitrile gloves. Rubber gloves.

Respiratory Use with adequate ventilation. Provide exhaust ventilation or other engineering controls to keep the airborne concentrations of vapors below their respective occupational exposure limits. Wear appropriate respirator when ventilation is inadequate. Approved/certified respirator with organic vapor cartridge.

Section 9. Physical and Chemical Properties

Physical State Liquid.	Color Colorless.
pH Not available.	Odor Mild.
Boiling Point 137°C (368.6°F)	Vapor Pressure < 1.0 @ 20°C
Specific Gravity 0.79	Vapor Density 5.3 (Air = 1)
Solubility Insoluble in the following materials: cold water.	Evaporation Rate 0.14 (Butyl acetate = 1)
Freezing Point	VOC (Consumer) 100% (789 g/L; 6.58 lbs/gal)

Product code 0366

Material Safety Data Sheet

Product Name: DYNA 143

Section 10. Stability and Reactivity

Stability and Reactivity The product is stable.
Incompatibility Reactive or incompatible with the following materials: oxidizing materials. Keep away from heat, sparks and flame.
Hazardous Polymerization Will not occur.
Hazardous Decomposition Products Under normal conditions of storage and use, hazardous decomposition products should not be produced.

Section 11. Toxicological Information

Carcinogenicity No known significant effects or critical hazards. Ingredients: Not listed as carcinogen by OSHA, NTP or IARC.

Acute Toxicity

Not available.

Section 12. Ecological Information

Environmental Effects No known significant effects or critical hazards.

Aquatic Ecotoxicity

Not available.

Section 13. Disposal Considerations**Waste Information**

Waste must be disposed of in accordance with applicable regulations. Consult your local or regional authorities for additional information.

Waste Stream**Section 14. Transport Information**

Regulatory information	UN number	Proper shipping name	Classes	PG*	Label	Additional information
TDG Classification	Not regulated.	-	-	-	-	-
IMDG Class	Not available.	Not available.	Not available.	-	-	-

NOTE: DOT classification applies to most package sizes. For specific container size classifications or for size exceptions, refer to the Bill of Lading with your shipment. Limited Quantity: Small quantities of controlled goods are not regulated as Dangerous Goods according to TDG regulations.

PG* : Packing group

Section 15. Regulatory Information**Canada**

WHMIS (Canada)

Class B-3: Combustible liquid with a flash point between 37.8°C (100°F) and 93.3°C (200°F).

This product has been classified in accordance with the hazard criteria of the Controlled Products Regulations and the MSDS contains all the information required by the Controlled Products Regulations.

Section 16. Other Information

To the best of our knowledge, the information contained herein is accurate. However, neither the above named supplier nor any of its subsidiaries assumes any liability whatsoever for the accuracy or completeness of the information contained herein. Final determination of suitability of any material is the sole responsibility of the user. All materials may present unknown hazards and should be used with caution. Although certain hazards are described herein, we cannot guarantee that these are the only hazards that exist.

OMEGA ENV 00000351

COMPANY IDENTITY: CSD/STARTEX
PRODUCT IDENTITY: XYLENE

DATE: 01/20/10
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MATERIAL SAFETY DATA SHEET

This Material Safety Data Sheet conforms to the requirements of ANSI Z400.1.
THIS MSDS COMPLIES WITH 29 CFR 1910.1200 (HAZARD COMMUNICATION STANDARD)
IMPORTANT: Read this MSDS before handling & disposing of this product.
Pass this information on to employees, customers, & users of this product.

SECTION 1. IDENTIFICATION OF THE SUBSTANCE/PREPARATION AND COMPANY

PRODUCT IDENTITY: XYLENE. TECHNICAL DGSC pd 6810-1
COMPANY IDENTITY: CSD/STARTEX
COMPANY ADDRESS: P O BOX 3087
COMPANY CITY: CONROE, TX 77305
COMPANY PHONE: 1-936-756-1065
CHEMTREC PHONE: 1-800-424-9300

SECTION 2. COMPOSITION/INFORMATION ON INGREDIENTS

CONTAINS: 75-85% XYLENES (1330-20-7) [215-535-7],
15-25% ETHYLBENZENE (100-41-4) [202-849-4]
Number in parentheses is CAS #, number in brackets is European EC #.

SECTION 3. HAZARDS IDENTIFICATION

RISK STATEMENTS:

R36/37/38 Irritating to eyes, respiratory system and skin.
R20/65 Harmful by inhalation, may cause lung damage if swallowed.

SAFETY STATEMENTS:

S16 Keep away from sources of ignition. No smoking.
S29 Do not empty into drains.
S24/25 Avoid contact with skin and eyes.

COMPANY IDENTITY: CSD/STARTEX
PRODUCT IDENTITY: XYLENE

DATE: 01/20/10
PAGE 2 OF 7

SECTION 4. FIRST AID MEASURES

EYE CONTACT:

For eyes, flush with plenty of water for 15 minutes & get medical attention.

SKIN CONTACT:

In case of contact with skin immediately remove contaminated clothing.
Wash thoroughly with soap & water. Wash contaminated clothing before reuse.

INHALATION:

After high vapor exposure, remove to fresh air. If breathing is difficult, give oxygen. If breathing has stopped give artificial respiration.

SWALLOWING:

If swallowed, CALL A PHYSICIAN IMMEDIATELY! Do NOT induce vomiting. Have patient lie down & keep warm. Vomiting may lead to pneumonitis, which may be fatal.

SECTION 5. FIRE FIGHTING MEASURES

EXTINGUISHING MEDIA

NEPA Class B extinguishers (Carbon Dioxide or foam) for Class I C liquid fires.

SPECIAL FIRE FIGHTING PROCEDURES

Water spray may be ineffective on fire but can protect fire-fighters & cool closed containers. Use fog nozzles if water is used.
Do not enter confined fire-space without full bunker gear.
(Helmet with face shield, bunker coats, gloves & rubber boots).
Use NIOSH approved positive-pressure self-contained breathing apparatus.

UNUSUAL EXPLOSION AND FIRE PROCEDURES

FLAMMABLE!! VAPORS CAN CAUSE FLASH FIRE

Keep container tightly closed.
Isolate from oxidizers, heat, sparks, electric equipment & open flame.
Closed containers may explode if exposed to extreme heat.
Applying to hot surfaces requires special precautions.
Empty container very hazardous! Continue all label precautions!

SECTION 6. ACCIDENTAL RELEASE MEASURES

CONTAINMENT TECHNIQUES

Stop spill at source. Dike area & contain.

CLEAN-UP PROCEDURES:

Clean up remainder with absorbent materials. Mop up & dispose of. Persons without proper protection should be kept from area until cleaned up.

COMPANY IDENTITY: CSD/STARTEX
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DATE: 01/20/10
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SECTION 7. HANDLING AND STORAGE

HANDLING

Isolate from oxidizers, heat, sparks, electric equipment & open flame.
Use only with adequate ventilation. Avoid breathing of vapor or spray mist.
Avoid prolonged or repeated contact with skin.
Wear OSHA Standard goggles or face shield. Consult Safety Equipment Supplier.
Wear gloves, apron & footwear impervious to this material. Wash clothing before reuse.
Avoid free fall of liquid. Ground containers when transferring. Do not flame cut, saw, drill, braze, or weld. Empty container very hazardous! Continue all label precautions!

STORAGE

Do not store above 49 C/120 F. Store large amounts in structures made for OSHA Class I C liquids
Keep container tightly closed
& upright when not in use to prevent leakage.

SECTION 8. EXPOSURE CONTROLS/PERSONAL PROTECTION:

EXPOSURE CONTROLS

Ventilate to keep vapors of this material below 50 ppm.
If over TLV, in accordance with 29 CFR 1910.134,
use NIOSH approved positive-pressure self-contained breathing apparatus.
Consult Safety Equipment Supplier. Use explosion-proof equipment.

VENTILATION

LOCAL EXHAUST	: Necessary
MECHANICAL (GENERAL)	: Acceptable
SPECIAL	: None
OTHER	: None

PERSONAL PROTECTIONS:

Wear OSHA Standard goggles or face shield. Consult Safety Equipment Supplier.
Wear gloves, apron & footwear impervious to this material. Wash clothing before reuse.

WORK & HYGIENIC PRACTICES:

Provide readily accessible eye wash stations & safety showers.
Wash at end of each workshift & before eating, smoking or using the toilet.
Promptly remove clothing that becomes contaminated. Destroy contaminated leather articles. Launder or discard contaminated clothing.

COMPANY IDENTITY: CSD/STARTEX
PRODUCT IDENTITY: XYLENE

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SECTION 9. PHYSICAL DATA

APPEARANCE : Liquid, Water-White
ODOR : Aromatic
BOILING RANGE : 136 140 142 C / 278 284 288 F
AUTO IGNITION TEMPERATURE : 510 C / 950 F (Lowest Component)
LOWER FLAMMABLE LIMIT IN AIR (% by vol): 1.1
FLASH POINT (TEST METHOD): 27 C / 81 F (TCC)
FLAMMABILITY CLASSIFICATION: Class I C
GRAVITY @ 60 F :
API : 31.1
SPECIFIC GRAVITY (Water=1) : .870
POUNDS/GALLON : 7.247
VOC'S (>0.44 Lbs/Sq In) : 100.1 Vol. % / 871.0 g/L / 7.255 Lbs/Gal
TOTAL VOC'S (TVOC) : 100.0 Vol. % / 870.0 g/L / 7.247 Lbs/Gal
NONEXEMPT VOC'S (CVOC) : 100.0 Vol. % / 870.0 g/L / 7.247 Lbs/Gal
HAZARDOUS AIR POLLUTANTS (HAPS) : 100.0 Wt. % / 870.0 g/L / 7.247 Lbs/Gal
VAPOR PRESSURE (mm of Hg)@20 C 6.4
NONEXEMPT VOC PARTIAL PRESSURE (mm of Hg @ 20 C) 6.4
VAPOR DENSITY (air=1) : 3.7
WATER ABSORPTION : Negligible
REFRACTIVE INDEX : 1.496
MIXED ANILINE POINT (Acid Insol): 10 C / 50 F

SECTION 10. STABILITY & REACTIVITY

STABILITY
Stable

CONDITIONS TO AVOID

Isolate from oxidizers, heat, sparks, electric equipment & open flame.

MATERIALS TO AVOID

Isolate from strong oxidizers such as permanganates, chromates & peroxides.

HAZARDOUS DECOMPOSITION PRODUCTS

Carbon Monoxide, Carbon Dioxide from burning.

HAZARDOUS POLYMERIZATION

Will not occur.

SECTION 11. TOXICOLOGICAL INFORMATION

MATERIAL	CAS #	TWA (OSHA)	TLV (ACGIH)	HAP
Xylenes	1330-20-7	100 ppm	100 ppm A4	Yes
Ethylbenzene	100-41-4	100 ppm	100 ppm A3	Yes

In addition to EPA Hazardous Air Pollutants showing 'Yes' under "HAP" above, using manufacturers' data, based on EPA Method 311, the following EPA Hazardous Air Pollutants may be present in trace amounts (less than 0.1%):
Benzene, Toluene, Cumene

COMPANY IDENTITY: CSD/STARTEX
PRODUCT IDENTITY: XYLENE

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SECTION 11. TOXICOLOGICAL INFORMATION (CONTINUED)

MATERIAL	CAS #	CEILING	STEL (OSHA/ACGIH)
Xylenes	1330-20-7	None Known	150 ppm
Ethylbenzene	100-41-4	None Known	125 ppm

ACUTE HAZARDS

EYE & SKIN CONTACT:

Primary irritation to skin, defatting, dermatitis.
Absorption thru skin increases exposure.
Primary irritation to eyes, redness, tearing, blurred vision.
Liquid can cause eye irritation. Wash thoroughly after handling.

INHALATION:

Anesthetic. Irritates respiratory tract. Acute overexposure
can cause serious nervous system depression. Vapor harmful.
Acute overexposure can cause damage to kidneys, blood, nerves, liver & lungs.

SWALLOWING:

Harmful or fatal if swallowed.
Swallowing can cause abdominal irritation, nausea, vomiting & diarrhea.

SUBCHRONIC HAZARDS/CONDITIONS AGGRAVATED

CONDITIONS AGGRAVATED

Chronic overexposure can cause damage to kidneys, blood, nerves, liver & lungs.
Persons with severe skin, liver or kidney problems should avoid use.

CHRONIC HAZARDS

CANCER, REPRODUCTIVE & OTHER CHRONIC HAZARDS:

Potential Cancer Hazard based on tests with laboratory animals
using Ethylbenzene.
Overexposure may create cancer risk.
Leukemia been reported in humans from Benzene.
This product contains less than 100 ppm of Benzene.
Not considered hazardous in such low concentrations.
Absorption thru skin may be harmful. Studies with laboratory animals
indicate this product can cause damage to fetus.

COMPANY IDENTITY: CSD/STARTEX
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SECTION 12. ECOLOGICAL INFORMATION

MAMMALIAN INFORMATION:

MATERIAL	CAS #	LOWEST KNOWN LETHAL DOSE DATA
		LOWEST KNOWN LD50 (ORAL)
Xylene	1330-20-7	4000.0 mg/kg (Rats)
		LOWEST KNOWN LC50 (VAPORS)
Xylene	1330-20-7	5000 ppm (Mice)

AQUATIC ANIMAL INFORMATION:

The most sensitive known aquatic group to any component of this product is:
Fish are adversely affected by
components of this product.

MOBILITY

This material is a mobile liquid.

DEGRADABILITY

This product is nonbiodegradable.

ACCUMULATION

This product does not accumulate or biomagnify in the environment.

SECTION 13. DISPOSAL CONSIDERATIONS

Recycle / dispose of observing national, regional, state, provincial and local
health, safety & pollution laws.
If questions exist, contact the appropriate agencies.

SECTION 14. TRANSPORT INFORMATION

DOT SHIPPING NAME: RQ,Xylenes,3,UN1307,PG-III
DRUM LABEL: (FLAMMABLE LIQUID)
IATA / ICAO: RQ,Xylenes,3,UN1307,PG-III
IMO / IMDG: RQ,Xylenes,3,UN1307,PG-III
EMERGENCY RESPONSE GUIDEBOOK NUMBER: 128

SECTION 15. REGULATORY INFORMATION

EPA REGULATION:

SARA SECTION 311/312 HAZARDS: Acute Health, Fire

All components of this product are on the TSCA list.

SARA Title III Section 313 Supplier Notification

This product contains the indicated <*> toxic chemicals subject to the
reporting requirements of Section 313 of the Emergency Planning & Community
Right-To-Know Act of 1986 & of 40 CFR 372. This information must be
included in all MSDSs that are copied and distributed for this material.

COMPANY IDENTITY: CSD/STARTEX
PRODUCT IDENTITY: XYLENE

DATE: 01/20/10
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SECTION 15. REGULATORY INFORMATION (CONTINUED)

SARA TITLE III INGREDIENTS	CAS#	WT. % (REG. SECTION)	RQ (LBS)
*Xylenes	1330-20-7	80 (311,312,313,RCRA)	100
*Ethylbenzene	100-41-4	20 (311,312,313,RCRA)	1000

IF > 125 POUNDS OF THIS PRODUCT IS IN ONE CONTAINER THE "RQ" OF XYLENE IS EXCEEDED.

STATE REGULATIONS:

CALIFORNIA PROPOSITION 65: This product contains the following chemical known to the State of California to cause cancer:
Ethylbenzene

INTERNATIONAL REGULATIONS

The components of this product are listed on the chemical inventories of the following countries:
Australia, Canada, Europe (EINECS), Japan, Korea, United Kingdom.

SECTION 16. OTHER INFORMATION

HAZARD RATINGS:
HEALTH (NFPA): 2
HEALTH (HMIS): 2
FLAMMABILITY: 3
REACTIVITY: 0

This information is intended solely for the use of individuals trained in the NFPA & HMIS hazard rating systems.

EMPLOYEE TRAINING

Employees should be made aware of all hazards of this material (as stated in this MSDS) before handling it.

NOTICE

The supplier disclaims all expressed or implied warranties of merchantability or fitness for a specific use, with respect to the product or the information provided herein, except for conformation to contracted specifications. All information appearing herein is based upon data obtained from manufacturers and/or recognized technical sources. While the information is believed to be accurate, we make no representations as to its accuracy or sufficiency. Conditions of use are beyond our control, and therefore users are responsible for verifying the data under their own operating conditions to determine whether the product is suitable for their particular purposes and they assume all risks of their use, handling, and disposal of the product. Users also assume all risks in regards to the publication or use of, or reliance upon, information contained herein. This information relates only to the product designated herein, and does not relate to its use in combination with any other material or process.

OMEGA ENV 00000358

PRO CHEM, INC.
107 BLUEBERRY LANE, FORT
ALPHEA, GA 31803
SUBSIDIARY OF PRO CHEM, INC. 107 BLUEBERRY LANE, FORT
ALPHEA, GA 31803
ADDITIONAL INFORMATION: 1-800-451-1111

MATERIAL SAFETY DATA SHEET

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HEALTH	2
FLAMMABILITY	0
REACTIVITY	0
PPE	3

Complies With USOL Safety and Health Regulations. (29 CFR 1910.200)

SECTION 1 - Chemical and Company Identification

PRODUCT USE: Degreaser

SECTION 2 - Composition on Ingredients

CAS #	CHEMICAL NAMES	WT %	TLV (UNITS)
111-76-3	2-butoxyethanol	< 10	25 (PPM) skin
1210-59-3	Potassium Hydroxide	< 1	2 mg/m ³
			NIE = not established

SECTION 3 - Hazards Information

PRIMARY ROUTE(S) OF ENTRY: Skin contact, absorption and inhalation
SIGNS AND SYMPTOMS OF OVEREXPOSURE: Gastrointestinal irritation (nausea, vomiting, diarrhea), irritation to nose, throat, and respiratory tract
TARGET ORGAN EFFECTS: Overexposure to this material (or its components) has been suggested as a cause of the following effects in laboratory animals and may aggravate pre-existing disorders or these organs in humans: chronic ingestion may cause kidney and liver lesions at high doses.

IMMEDIATE HEALTH EFFECTS:

EYES: Corneal injury. Exposure may cause noticeable pain, and severe irritation and transient corneal injury.

SKIN: Corrosive. Causes chemical burns. Harmful contact may not cause immediate pain. Ethylene glycol monobutyl ether and 2-aminoethanol may be absorbed through the skin.

INHALATION: Exposure to vapor or mist is possible. Short-term inhalation is not likely to cause harmful effects; breathing large amounts may be harmful. Symptoms are more typically seen at air concentrations exceeding the recommended exposure limits.

INGESTION: Harmful or fatal if swallowed. Causes chemical burns to the mouth, throat and stomach.

REPRODUCTIVE/DEVELOPMENTAL INFORMATION: No data.

CARCINOGENIC INFORMATION: This material is not listed as a carcinogen by IARC, NTP, or OSHA.

LONG TERM EFFECTS: No data.

SECTION 4 - First Aid Measures

EYES: Immediately flush with water. Remove contact lenses, if applicable, and continue flushing with water for 15 minutes. Call a physician immediately.

SKIN: Immediately flush with water for 15 minutes. Call physician if irritation persists. Completely decontaminate clothing, shoes, and leather goods before reuse or discard.

INHALATION: If symptoms develop more severe than irritation, call a physician.

INGESTION: Do not induce vomiting. Rinse mouth with water, then drink one or two glasses of water or milk. Call a physician immediately. Never give anything by mouth if victim is unconscious, is rapidly losing consciousness or is convulsing.

SECTION 5 - Fire Fighting Measures

FLASH POINT: No flash at 20°C

EXPLOSION LIMITS: Not Applicable

AUTOTEMPERATURE: Not Applicable

HAZARDOUS PRODUCTS OF COMBUSTION: Oxides of carbon, oxides of nitrogen, and ammonia

EXTINGUISHING MEDIA: Not Applicable

FIRE FIGHTING INSTRUCTIONS: Avoid contact with this material. Avoid walking in spilled

SECTION 6 - Accidental Release Measures

SMALL SPILL: Absorb with an inert solid and scoop up for disposal, then rinse spilled area with water down the drain.

LARGE SPILL: Stop leak at the source and collect into a suitable container, then treat as a small spill.

SECTION 7 - Handling and Storage

HANDLING: Contents of this material may be hazardous when emptied. Since emptied containers retain product residues (vapor, liquid, and/or solid), all hazard precautions given in the data sheet must be observed.

STORAGE: Store in a cool, dry place. Keep container closed when not in use.

SECTION 8 - Exposure Controls/Personal Protection

EYE PROTECTION: Chemical splash goggles in compliance with OSHA regulations are advised; however, OSHA regulations also permit other type safety glasses. Consult your safety representative.

SKIN PROTECTION: Wear rubber gloves (consult your safety equipment supplier). To prevent repeated or prolonged skin contact, wear impervious clothing and boots.

RESPIRATORY PROTECTION: If workplace exposure limits of product or any component are exceeded (see exposure guidelines), NIOSH/OSHA approved air-supplied respirator is advised in the absence of proper environmental control. OSHA regulations also permit other NIOSH/OSHA respirators (negative pressure type) under specific conditions (see your industrial hygienist). Engineering or administrative controls should be implemented to reduce exposure.

ENGINEERING CONTROLS: Provide sufficient mechanical (general and local exhaust) ventilation to maintain exposure below level of overexposure (from known, suspected or apparent adverse effects).

SECTION 9 - Physical and Chemical Properties

APPEARANCE/ODOR: Thin, purple liquid with a solvent odor

pH CONCENTRATE: 12.5-13.5

VAPOR PRESSURE: Unknown

BOILING POINT: 312°F

PERCENT VOLATILE: 90%

VAPOR DENSITY: Unknown

SOLUBILITY IN WATER: Complete

SPECIFIC GRAVITY (H2O=1): 1.05-1.07

SECTION 10 - Stability and Reactivity

CHEMICAL STABILITY: Stable

CONDITIONS TO AVOID: Temperature extremes.

INCOMPATIBILITY: Chlorine bleach, oxidizers, acids.

HAZARDOUS DECOMPOSITION: Will not occur.

HAZARDOUS POLYMERIZATION: Will not occur.

SECTION 11 - Toxicological Information

No data available.

SECTION 12 - Ecological Information

No data available.

SECTION 13 - Disposal Consideration

WASTE DISPOSAL INFORMATION: Dispose of in accordance with all applicable Federal, State, and Local regulations.

THIS INFORMATION IS NOT TO BE USED FOR ANY PURPOSES OTHER THAN THAT FOR WHICH IT WAS OBTAINED. PRO CHEM ASSUMES NO RESPONSIBILITY FOR PERSONAL INJURY OR PROPERTY DAMAGE TO USER. USER ASSUMES ALL RISKS ASSOCIATED WITH USE.

PRO CHEM, INC.
1415 BUREAU BLVD. SE
ALPHARETTA, GA 30004
SUBSIDIARY OF 1-800-241-8148
ADDITIONAL BUSINESS UNIT # RPS TRAC 1-800-434-6223

MATERIAL SAFETY DATA SHEET

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PAGE 2

HEALTH	2
FLAM	0
REACTIVITY	0
PPE	3

Complies With USGOL Safety and Health Regulations, (29 CFR 1910.200)

RCRA INFORMATION: If this material becomes a waste, it would be considered hazardous under 40 CFR 261.22, and would be classified as EPA Waste Number D002.

SECTION 14 - Transport Information

DOT INFORMATION: 49 CFR 172.101
DOT DESCRIPTION: 3340 Class 55
DOT HAZARD CLASS: Non-hazardous
REPORTABLE QUANTITY (RQ): 49 CFR 172.101
NOT APPLICABLE

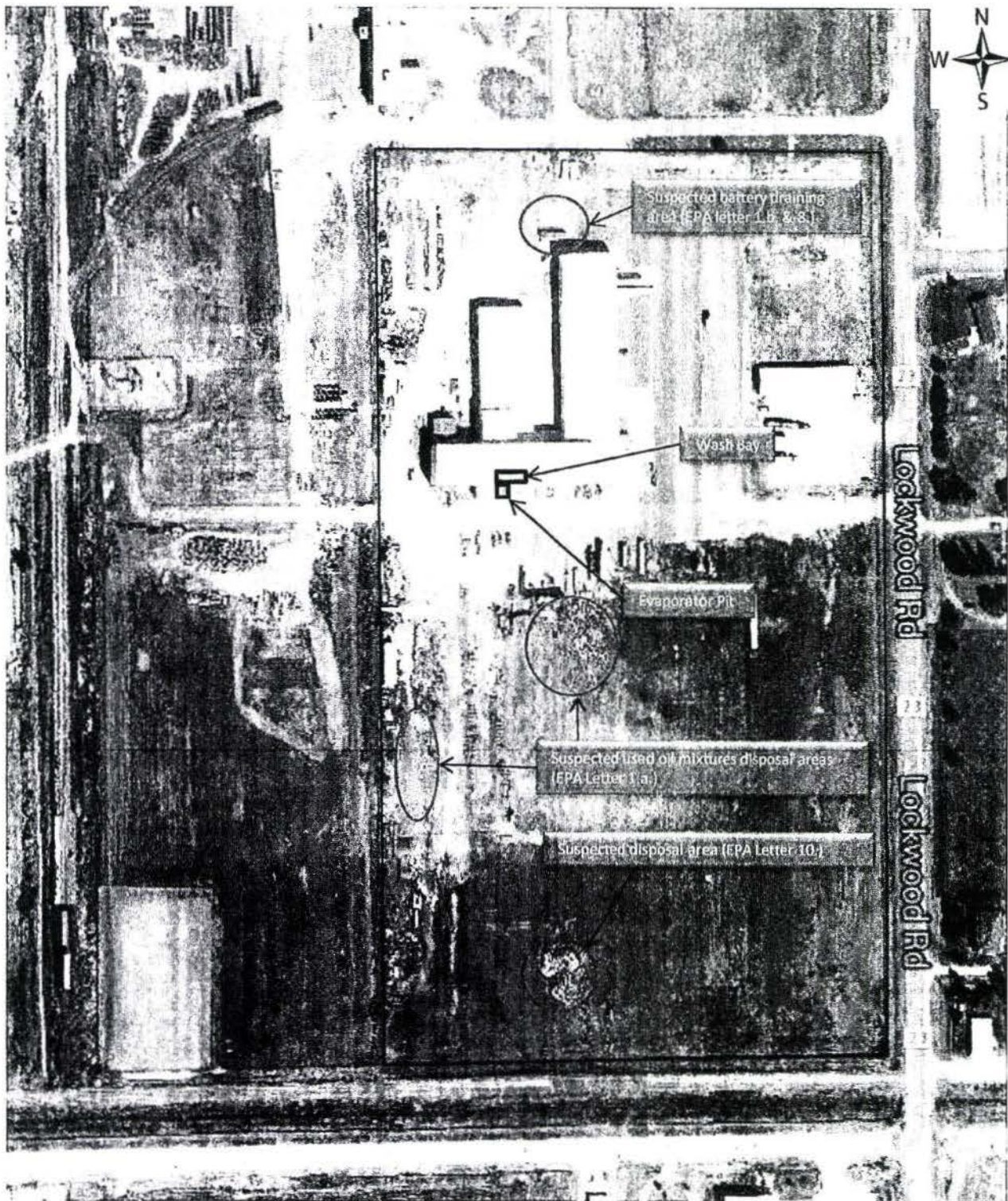
SECTION 15 - Regulatory Information

US Federal Regulations:
TSCA (Toxic Substances Control Act) Status:
TSCA (United States) The intentional ingredients of this product are listed:
CERCLA EO - 40 CFR 353 Appendix A: None
SARA 302 Components 40 CFR Appendix A: None
Section 311/312 Hazard Codes 40 CFR 370.2: Immediate (X) Delayed (X) P () Reactivity ()
Sudden Release of Pressure ()
SARA 313 Components - 40 CFR 372.65
CAS # Chemical Names %
N/A Glycol Ethers < 10.0
* Listed in Section 2 as Ethylene Glycol Monobutyl Ether
State and Local Regulation:
California Proposition 65: None
California GCA/MS Rule 143.1 VOC's: > 250 g/L
North Carolina Administrative Code 20.1104 and 29.0810: None
South Carolina Regulation 61.5 Standard Number 8: Ethylene Glycol Monobutyl Ether < 16.0

SECTION 16 - Other Information

The information accumulated herein is believed to be accurate but is not warranted to be whether originating with the company or not. Recipients are advised to confirm in advance of need that the information is current, applicable and suitable to their circumstances. This information was compiled from current manufacturer's MSDS's of the component parts of the product, as well as other sources, such as:
Code of Federal Regulations 29, Revised as of July 1, 1994.
Code of Federal Regulations 40, Revised as of July 1, 1994.
ACGIH, Guide to Occupational Exposure Values, 1999.
NIOSH 2129-1-1994, Predictive Labeling for Hazardous Industrial Chemicals.
Hazard Communication Handbook, A Right To Know Compliance Guide. Craig A. Meyer & Michael Francis. Clark Breadwin Company, Ltd. New York, NY 1992
RCRA Regulations and Keyword Index, Compiled and Published by McCoy and Associates, Inc. Lakewood, Colorado. 1992.

THIS INFORMATION HAS BEEN ANALYZED, COMPILED AND DISTRIBUTED FOR THIS MATERIAL.
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INJURY OR PROPERTY DAMAGE TO USER. USER/USER ASSUMES ALL RISKS ASSOCIATED
WITH USE.



Material Safety Data Sheet



Superior Solutions

Zep Inc.
1310 Seaboard Industrial Blvd.
Atlanta, GA 30318
1-877-1-BUY-ZEP (428-9937)
www.zep.com

Section 1. Chemical Product and Company Identification

Product name **ZEP OJ**
Product use **Cleaner, Degreaser**
Product code **0771**
Date of issue **09/29/08** Supersedes **03/03/05**

Emergency Telephone Numbers

For MSDS Information:
Compliance Services 1-877-1-BUY-ZEP (428-9937)

For Medical Emergency
INFOTRAC: (877) 541-2016 Toll Free - All Calls
Recorded

For Transportation Emergency
CHEMTREC: (800) 424-9300 - All Calls Recorded
In the District of Columbia (202) 483-7616

Prepared By
Compliance Services
1420 Seaboard Industrial Blvd.
Atlanta, GA 30318

301



OMEGA CAPITAL
130900 LOCKWOOD RD
GERING NE 69341-5212

Printing date: 05/08/12

Section 2. Hazards Identification

Emergency overview

DANGER

CAUSES EYE AND SKIN BURNS. HARMFUL IF SWALLOWED.

COMBUSTIBLE

NOTE: MSDS data pertains to the product as delivered in the original shipping container(s). Risk of adverse effects are lessened by following all prescribed safety precautions, including the use of proper personal protective equipment.

Hazard Determination System (HDS): Health, Flammability, Reactivity



Route Effects

Routes of Entry

Dermal contact. Eye contact. Inhalation.

Eyes

Corrosive to eyes. Direct contact with the eyes can cause irreversible damage, including blindness.

Skin

Corrosive to the skin. Skin contact may produce burns. May cause skin sensitization. Skin inflammation is characterized by itching, scaling, or reddening.

Inhalation

Inhalation of the spray or mist may produce severe irritation of respiratory tract, characterized by coughing, choking or shortness of breath. Over-exposure by inhalation may cause respiratory irritation.

Ingestion

Harmful if swallowed. May cause burns to mouth, throat and stomach.

Chronic effects

The substance may be toxic to kidneys and liver. Repeated or prolonged exposure to the substance can produce target organs damage. Repeated or prolonged contact with spray or mist may produce chronic eye irritation and severe skin irritation. Repeated or prolonged exposure to spray or mist may produce respiratory tract irritation leading to frequent attacks of bronchial infection.

Carcinogenicity Ingredients: Not listed as carcinogen by OSHA, NTP or IARC.

Additional Information: See Toxicological Information (Section 11)

Section 3. Composition/Information on Ingredients

D-LIMONENE; orange distillate; citrus terpene; cyclohexene, 1-methyl-4-(1-methylethenyl)-, (R)-	5989-27-5	1 - 10
SODIUM METASILICATE; silicic acid (H ₂ -Si-O ₃) disodium salt; water glass	6834-92-0	<5
SODIUM TRIPOLYPHOSPHATE	7758-29-4	<5
SODIUM HYDROXIDE; caustic soda; soda lye	1310-73-2	1 - 5
DIPROPYLENE GLYCOL METHYL ETHER; dipropylene glycol monomethyl ether	34590-94-8	1 - 5
PROPYLENE GLYCOL N-BUTYL ETHER; 1-butoxy-2-propanol	5131-66-8	1 - 5

OMEGA ENV000002

Section 9. Physical and Chemical Properties

Physical State Liquid.
 pH 13.0-14.0
 Boiling Point 98.9°C (210°F)
 Specific Gravity 1.07 (Water = 1)
 Solubility Soluble in the following materials: cold water and hot water.

Color Amber.
 Odor Orange.
 Vapor Pressure Not determined.
 Vapor Density Not determined.
 Evaporation Rate 1 compared with Water

VOC (Consumer) 142.06 (g/l). 1.19 lbs/gal 13.30%

Section 10. Stability and Reactivity

Stability and Reactivity The product is stable.
 Incompatibility Reactive or incompatible with the following materials: oxidizing materials, metals and acids.
 Hazardous Polymerization Will not occur.
 Hazardous Decomposition Products carbon oxides (CO, CO₂) and other organic materials.

Section 11. Toxicological Information**Acute Toxicity**

Product/Ingredient name	Result	Species	Dose	Exposure
Sodium Tripolyphosphate	LD50 Dermal	Rabbit	>7940 mg/kg	-
	LD50 Oral	Rat	5400 mg/kg	-
Sodium Metasilicate	LD50 Oral	Rat	1153 mg/kg	-
	LD50 Oral	Mouse	770 mg/kg	-
Sodium Hydroxide	LD50 Dermal	Rabbit	>1000 mg/kg	-
	LD50 Oral	Rat	500 mg/kg	-
Dipropylene Glycol Methyl Ether	LD50 Dermal	Rabbit	13000 mg/kg	-
	LD50 Oral	Rat	5320 mg/kg	-
Propylene Glycol N-Butyl Ether	LD50 Dermal	Rabbit	1400 mg/kg	-
	LD50 Oral	Rat	3300 mg/kg	-

Section 12. Ecological Information

Environmental Effects No known significant effects or critical hazards.

Aquatic Ecotoxicity


Product/Ingredient name	Test	Result	Species	Exposure
Sodium Hydroxide	-	Acute LC50 25 ppm	Fish - Trout	24 hours

Section 13. Disposal Considerations**Waste Information**

Waste must be disposed of in accordance with federal, state and local environmental control regulations. Consult your local or regional authorities for additional information.

Waste Stream Code: D002, D001
 Classification: - (Hazardous waste.)
 Origin: - (RCRA waste.)

Section 14. Transport Information

Regulatory information	UN number	Proper shipping name	Classes	PG*	Label
DOT Classification	3266	Corrosive liquid, basic, inorganic, n.o.s. (Sodium Hydroxide)	8	II	
IMDG Class	Not determined.				

NOTE: DOT classification applies to most package sizes. For specific container size classifications or for size exceptions, refer to Bill of Lading with your shipment.

*: Packing group

MATERIAL SAFETY DATA SHEET

Total Solutions
P.O. Box 240014
Milwaukee, WI 53224

** Revision*
**TOTAL
SOLUTIONS**

GENERAL INFORMATION NUMBER: (414) 354-6417
CHEMTREC: (800) 424-9300

REVISION DATE: January 16, 2007
DATE OF ISSUE: January 16, 2007

I - Product Identification

Aluminum Cleaner and Brightener

PRODUCT CODE: 0103

CHEMICAL FORMULATION: Inorganic acid cleaner,

HAZARD IDENTIFICATION SYSTEM: HEALTH: 4

HAZARD RATING: 4 - Extreme; 3 - High; 2 - Moderate; 1 - Slight; 0 - Insignificant

FLAMMABILITY: 0

REACTIVITY: 1

II - Hazardous Ingredients

Values reported as TWA unless noted.

SUBSTANCE	APPROX %	OSHA PEL	ACGIH TLV	EPA 40 CFR:			CAS #
				302	355	372	
Sulfuric Acid	10.0-20.0	1 mg/m ³	1 mg/m ³	Y	Y	Y	7664-93-9
Hydrofluoric Acid	5.0-10.0	3 ppm	3 ppm C	Y	Y	Y	7664-39-3
Quaternary ammonium compounds	<5.0	N/E	N/E	N	N	N	68187-69-9

Key: PEL: Permissible Exposure Limit TLV: Threshold Limit Value C: Ceiling level STEL: Short Term Exposure Limit
N/A: Not Applicable N/D: Not Determined N/E: Not Established Y: Yes N: No
302: CERCLA List of Hazardous Substances and Reportable Quantities (40 CFR 302.4).
355: SARA TITLE III / List of Extremely Hazardous Substances for Emergency Planning and Notification (40 CFR 355).
372: SARA TITLE III / List of Toxic Chemicals subject to Release Reporting (Community Right to Know) (40 CFR 372).

III - Physical Data

BOILING POINT (°F): N/D SPECIFIC GRAVITY (WATER = 1): 1.139
VAPOR PRESSURE (mm Hg): N/D VOC CONTENT (% by weight): <5.0
VAPOR DENSITY (AIR = 1): N/D EVAPORATION RATE (WATER = 1): N/D
SOLUBILITY IN WATER: Soluble pH: 1.00
APPEARANCE AND ODOR: Clear, slight yellow liquid; characteristic acid odor.

IV - Fire and Explosion Hazard Data

FLASH POINT (°F): None. (TEST METHOD): Closed cup
FLAMMABLE LIMITS IN AIR (VOLUME %) UPPER: N/A LOWER: N/A
EXTINGUISHING MEDIA: Water spray, foam, carbon dioxide, dry chemical.
SPECIAL FIRE FIGHTING PROCEDURES: Firefighters must be equipped with full protective gear, including self-contained breathing apparatus. Cool fire exposed containers with water spray. Run-off from fire control may cause pollution. Neutralize run-off with lime, soda ash, etc.
UNUSUAL FIRE AND EXPLOSION HAZARD: Acid may react with metals to create explosive hydrogen accumulations. Fire may produce toxic fumes. Product generates heat upon addition of water, with possible spattering.

OMEGA ENV000004

V - Reactivity Data**STABILITY:** Stable**INCOMPATIBILITY:** Alkaline materials, metal salts, oxidizing materials and organic materials.**CONDITIONS TO AVOID:** Do not mix with chlorine bleach, ammonia or any other cleaning chemical.**HAZARDOUS DECOMPOSITION PRODUCTS:** Thermal decomposition can produce a wide variety of toxic gases and vapors.**HAZARDOUS POLYMERIZATION:** Will not occur.**CONDITIONS TO AVOID:** None**VI - Health Hazard Data****ROUTES OF ENTRY** **INHALATION:** X **EYE CONTACT:** X **SKIN CONTACT:** X **INGESTION:** X
INGREDIENTS THAT ARE CONSIDERED BY OSHA, NTP, IARC TO BE SUSPECTED HUMAN CARCINOGENS: None.**EFFECTS OF OVEREXPOSURE****IF IN EYES:** DANGER Corrosive-Severe irritation, burns, destruction of tissue, blindness.**IF ON SKIN:** DANGER Corrosive-Severe irritation, deep ulcerations that may not be immediately painful or evident. Hydrofluoric acid will penetrate the skin and attack underlying tissues and bone. Large burns may also cause hypocalcemia and other toxic effects which may be fatal.**IF SWALLOWED:** MAY BE HARMFUL OR FATAL IF SWALLOWED. Severe burns, destruction of tissue. Small amounts or dilute solutions fatal hypocalcemia and systemic toxicity is likely to occur unless medical treatment is immediately obtained.**IF INHALED:** Short-term exposure causes nose, throat & respiratory irritation which may be delayed for several hours. Long-term exposure causes nose and throat burns, lung inflammation, pulmonary edema and fatal hypocalcemia.**EMERGENCY AND FIRST AID PROCEDURES****IF IN EYES:** Flush eyes and under eyelids with plenty of cool water for at least 15 minutes. Obtain immediate medical attention.**IF ON SKIN:** Flush with plenty of cool water for at least 15 minutes while removing contaminated clothing and shoes. Pay close attention to area under nails. Obtain medical attention immediately! Follow by immersing affected skin in an ice cold solution of magnesium sulfate (Epsom Salt) or using a calcium gluconate gel.**IF SWALLOWED:** DO NOT INDUCE VOMITING. Give large quantities of water followed with several glasses of milk or several ounces of milk of magnesia. Never give anything by mouth to an unconscious person. Obtain medical attention immediately.**IF INHALED:** Remove person to fresh air. Administer artificial respiration if indicated. If breathing is difficult, give oxygen. Keep person warm and quiet. Obtain medical attention immediately.**VII - Spill or Leak Protection****STEPS TO BE TAKEN IF MATERIAL IS RELEASED OR SPILLED:** Ventilate area. Contain spill. Soak up spilled material with inert absorbent material and place in a properly marked closed container for proper disposal.**WASTE DISPOSAL METHOD:** Consult local environmental authorities.**VIII - Special Protection Information****RESPIRATORY PROTECTION:** Use with adequate ventilation. Do not breathe vapors or mists. If recommended Exposure Limits are exceeded wear a NIOSH approved respirator, following manufacturer's recommendations.**VENTILATION** **LOCAL:** Recommended **MECHANICAL:** Recommended**PROTECTIVE GLOVES:** Chemical resistant gauntlet type gloves.**EYE PROTECTION:** Chemical goggles and/or face shield.**OTHER PROTECTIVE EQUIPMENT:** Protective clothing, emergency shower and eye wash station.**PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE:** Corrosive material. Store in a cool, dry place away from alkaline materials and reactive chemicals. Do not mix with any other cleaning chemicals. Always add this product to water, never add water to this product. Wash thoroughly after handling.**OTHER PRECAUTIONS:** Keep out of reach of children.**IX - Transportation Information (ground transportation only)****DOT ID #:** UN2922 **DOT PROPER SHIPPING NAME:** Corrosive Liquids, Toxic, N.O.S. (hydrofluoric acid, sulfuric acid)
DOT CLASS: 8, (6.1) **DOT PACKING GROUP:** II

The shipping information listed above applies only to non-bulk (< 119 gallons) containers of this product. This product may have more than one proper shipping name depending on packaging, product properties, & mode of shipment. If any alteration of packaging, product, or mode of transportation is further intended, different shipping names and labeling may apply.

REVISION DATE: January 16, 2007**Prepared by:** Technical Dept.**DATE OF ISSUE:** January 16, 2007

This information contained herein is based on data considered accurate. However, no warranty is expressed or implied regarding the accuracy of this data or the results to be obtained from the use thereof. Total Solutions assumes no responsibility for personal injury or property damage to the vendee, users or third parties caused by the material such vendees or users assume all risks associated with the use of this material.

safety-kleen.

PROTECT CHOICE PEOPLE SAFETY-KLEEN SYSTEMS, INC.
MAKE GREEN WORK 2600 North Central Expressway Ste 400
Richardson, TX 75080

DUNS NO: 05-297-6551
FED ID NO: 39-6090019

INVOICE

Page 1 of 1

Billing Account #	Service Account #	Invoice #	Invoice Date
OM10802	OM10802	62238025	11/12/13

Billing Address
OMEGA CAPITAL
130900 LOCKWOOD RD
GERING NE 69341

Service Address
OMEGA CAPITAL
130900 LOCKWOOD RD
GERING NE 69341

Branch Location
BR CASPER

Terms
NET 30 DAYS

For Questions Call:
307-265-7795

Service Date
11/12/13

12/12

PO Number	Department #	Department	Manifest #	Tax Status/#		
QUANTITY	PART#	TERM	SERIAL/PROFILE #	UNIT PRICE UOM	SALES TAX	TOTAL
1	100001	24		\$18.1200 EA	\$0.89	\$17.01
	FEE, FUEL SURCHARGE					
5	8003369	24		\$75.0000 EA	\$20.90	\$400.90
	DRUM OPEN HEAD 55GL - BLACK - USED					
1	82100	24		\$100.0000 EA	\$0.00	\$100.00
	PROFILE, MANUAL OR PAPER					
11	875390	24	892686	\$300.0000 DR	\$0.00	\$3,300.00
	oily sludge					

SUBTOTAL
TOTAL TAX
TOTAL AMOUNT DUE

\$3,796.12
\$21.79
\$3,817.91

Comments:

Pay Your Invoice Online! You can also opt for paperless billing with our new customer portal. Simply go to www.safety-kleen.com and click on My Account.

Ab 4410:
700000

C

OK PER DW
11/25/13

Please be advised delinquent payments may result in a Late Payment Charge of \$25.



SAFETY-KLEEN SYSTEMS, INC.
2600 North Central Expressway Ste 400
Richardson, TX 75080

Billing Account #	Service Account #	Invoice #	Invoice Date
OM10802	OM10802	62238025	11/12/13

PLEASE RETURN THIS PORTION WITH PAYMENT.
MAKE ANY ADDRESS CORRECTIONS BELOW.

Date Due

Amount Due

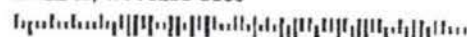
12/12/13

\$3,817.91

000622380250000M10802400003817912

MDG2012 00001883 1 MB 0405 9 1
OMEGA CAPITAL
30900 LOCKWOOD RD
GERING NE 69341

SAFETY-KLEEN SYSTEMS, INC.
PO BOX 650509
DALLAS, TX 75265-0509



IFX-INVOICE

OMEGA ENV000006

ATTACHMENT 106 Page 76 of 106

OMEGA ENV000007

BRANCH CSY CSG 1

Joseph Bone

11/12/13 15:56 PAGE 5

Safety-Kleen Systems, Inc.

2800 N Central Expy, Suite 400
Richardson, TX 75080
800-669-5740
1072657795

REFERENCE NBR.

62278025

SRVC WEEK: 2013-46

SRVC DATE: 11/12/13 15:56

CUSTOMER# 0M10802

Omega Capital
170900 Lockwood Rd
Gering NE 68341-5212
PHONE 308-436-0004

BILL TO CUSTOMER#
0M10802

BILL TO ADDRESS:
Omega Capital
170900 Lockwood Rd
Gering NE 68341-5212
PHONE 308-436-0004

PURCHASE ORDER#

TAX EXEMPTION NBR

PRODUCT/SERVICES

SERVICE/ PRODUCT	QTY	UNIT PRICE	TAX	TOTAL CHARGE
#2100 MANUAL PAPER PROFILE SERVICE TERM 24 WEEK	1.000	100.0000	0.00	100.00
8003369 DRUM, 55 GL BLACK STEEL U SERVICE TERM 24 WEEK	5.000	76.0000	20.90	400.90
692686/ 875390 LF HAZ SLOP/FCTN SSGL SERVICE TERM 24 WEEK	11.000	100.0000	0.00	1100.00
4 CONTN: 11 150F: UN MATHPS/18: QUITMAG45N PORN CU: 125 SR SHIP# 211615868				
CNT# 131104597140 QTY: 450 WT/VOL P	WT/VOL P	PROF: 0692686 SKDU: 7411654		
CNT# 131104597141 QTY: 450 WT/VOL P	WT/VOL P	PROF: 0692686 SKDU: 7411654		
CNT# 131104597142 QTY: 450 WT/VOL P	WT/VOL P	PROF: 0692686 SKDU: 7411654		
CNT# 131104597143 QTY: 450 WT/VOL P	WT/VOL P	PROF: 0692686 SKDU: 7411654		
CNT# 131104597144 QTY: 450 WT/VOL P	WT/VOL P	PROF: 0692686 SKDU: 7411654		
CNT# 131104597145 QTY: 450 WT/VOL P	WT/VOL P	PROF: 0692686 SKDU: 7411654		
CNT# 131104597146 QTY: 450 WT/VOL P	WT/VOL P	PROF: 0692686 SKDU: 7411654		
CNT# 131104597147 QTY: 450 WT/VOL P	WT/VOL P	PROF: 0692686 SKDU: 7411654		
CNT# 131104597148 QTY: 450 WT/VOL P	WT/VOL P	PROF: 0692686 SKDU: 7411654		
CNT# 131104597149 QTY: 450 WT/VOL P	WT/VOL P	PROF: 0692686 SKDU: 7411654		
CNT# 131104597150 QTY: 450 WT/VOL P	WT/VOL P	PROF: 0692686 SKDU: 7411654		
100001 FEE, FUEL SURCHARGE	1.000	10.1200	0.89	17.01
TOTAL SERVICE/PRODUCTS		492.1200	21.79	3817.91
TOTAL CHARGE				3817.91

BRANCH CSY CSG 1

Joseph Bone

11/12/13 15:56 PAGE 5

Safety-Kleen Systems, Inc.

2600 N Central Exp, Suite 400
Richardson, TX 75080
800-669-5740
3072657795

CUSTOMER# OM10802

Omega Capital
130900 Lockwood Rd
Gering NE 68341-5212
PHONE 308-436-0004

REFERENCE NBR.

62238025

SRVC WEEK: 2013-46

SRVC DATE: 11/12/13 15:56

BILL TO CUSTOMER#
OM10802BILL TO ADDRESS:
Omega Capital
130900 Lockwood Rd
Gering NE 68341-5212
PHONE 308-436-0004

PURCHASE ORDER#

TAX EXEMPTION NBR

PRODUCT/SERVICES

SERVICE/ PRODUCT	QTY	UNIT PRICE	TAX	TOTAL CHARGE
82100 MANUAL PAPER PROFILE SERVICE TERM 24 WEEK	1.000	100.0000	0.00	100.00
8003369 DNDI, 55 GL BLACK STEEL O SERVICE TERM 24 WEEK	5.000	76.0000	20.90	400.90
697086/ 875380 LF MAX SLDIFICTN SSGL SERVICE TERM 24 WEEK	11.000	300.0000	0.00	3300.00
* COM1: 11 ISO: DM MANTHES1: 001104597140 QTY: 450 WT/VOL P PROFILE: 0892686 SKDOT 7411654				
CNT# 131104597141 QTY: 450 WT/VOL P PROFILE: 0892686 SKDOT 7411654				
CNT# 131104597142 QTY: 450 WT/VOL P PROFILE: 0892686 SKDOT 7411654				
CNT# 131104597143 QTY: 450 WT/VOL P PROFILE: 0892686 SKDOT 7411654				
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CNT# 131104597145 QTY: 450 WT/VOL P PROFILE: 0892686 SKDOT 7411654				
CNT# 131104597146 QTY: 450 WT/VOL P PROFILE: 0892686 SKDOT 7411654				
CNT# 131104597147 QTY: 450 WT/VOL P PROFILE: 0892686 SKDOT 7411654				
CNT# 131104597148 QTY: 450 WT/VOL P PROFILE: 0892686 SKDOT 7411654				
CNT# 131104597149 QTY: 450 WT/VOL P PROFILE: 0892686 SKDOT 7411654				
CNT# 131104597150 QTY: 450 WT/VOL P PROFILE: 0892686 SKDOT 7411654				
100001 FEE, FUEL SURCHARGE	1.000	16.1200	0.89	17.01
TOTAL SERVICE/PRODUCTS		492.1200	21.79	3817.91
TOTAL CHARGE				3817.91

GENERATOR STATUS
0-220 lbs/month

Customer certifies that (1) the above-named materials are properly classified, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and (2) no material change has occurred either in the characteristics of the waste/material or in the process generating the waste/material. Customer agrees to pay the above charges and to be bound by the terms and conditions (1) set forth in (A) the General Terms and Conditions provided separately to Customer or (B) any SK agreement signed by Customer and SK, and (C) incorporated herein by reference. Unless otherwise indicated in the payment received section, SK is authorized to charge Customer's account for this transaction. Customer certifies that the individual signing this Service Acknowledgment is duly authorized to sign and bind Customer. The following provision is applicable to Safety-Kleen's parts cleaner and paint gun cleaner services: Customer agrees that it will not introduce any substance into the solvent or aqueous cleaning solution, including without limitation any hazardous waste or hazardous waste constituent, except to the extent such introduction is incidental to the normal use of the machine. Customer further agrees that it will not clean parts/paint guns that have been contaminated with or otherwise introduce polychlorinated biphenyls (PCBs), herbicides, pesticides, dioxins or listed hazardous waste into the solvent or aqueous cleaning solution. Safety-Kleen has the capacity and is permitted to accept, store, and/or reclaim the spent parts washer solvent; paint thinners, solvents and paints generated by customer; or dry cleaning filter cartridges, powder, and still residues containing perchloroethylene, petroleum naphtha, or trifluorochloroethane dry cleaning solvents. Customer agrees that it is responsible for properly classifying its waste streams as Used Oil or Nonhazardous Waste in accordance with the provision of 40 CFR 262.11 and applicable state laws. Customer agrees that it will not introduce any non-conforming substance into the SK Property, including, without limitation, any hazardous waste or hazardous waste constituent, i.e., polychlorinated biphenyls ("PCBs"), herbicides, pesticides, dioxins, or listed hazardous wastes) except to the extent such introduction is incidental to the normal use of the SK Property. In the event of the introduction of such non-conforming hazardous waste, Customer agrees that it will be responsible for all costs and remediation expenses related to or arising from the proper management and disposal of the non-conforming waste, including the cost of equipment decontamination and subsequent disposal. If any legal action is commenced because of an alleged dispute, breach, default or misrepresentation, the Customer also agrees that the prevailing party will be entitled to recover reasonable attorney's fees and costs associated with the non-conforming contamination event. Safety-Kleen's failure to screen Customer's material or take a retain sample, in no way constitutes a waiver of Customer's obligation to properly classify its materials. Safety-Kleen relies on Customer's representations and Customer is responsible for informing Safety-Kleen of any process changes that may alter the characteristics of the materials provided. IN THE EVENT OF AN EMERGENCY CALL 24 HR EMERGENCY # 1-800-468-1760 (Safety-Kleen Contract # 94138)



CUSTOMER / GENERATOR: Jeff McClure

LAST PAGE

BRANCH 7142 CSG 3

Jim Mason

09/20/13 10:14 PAGE 2

SHIPPING DOCUMENT

CUSTOMER#/GENERATOR: 10178834 OMEGA CAPITAL
130000 Lockwood Rd
Gering NE 69341-5212
PHONE 308-438-0084

REFERENCE NO.
61855179

SRVC DATE: 09/20/13

GENERATOR USEPA ID. GENERATOR STATE
MANIFEST# FORM CD: NR SK SHEET# 211248698
TRANSPORTER 1 TXID00081295
TRANSPORTER 2

US DOT DESCRIPTION (INCLUDING PROPER SHIPPING NAME, HAZARD CLASS, AND ID)

NONE, NON-REGULATED LIQUID, (USED OIL)

N/A

FEDERAL WASTE CODES NONE

STATE WASTE CODES

TOTAL CONT 1

TYPE TT WT/VOL G SKDOT 7402230
CNTRY: 130920535060 SZ: BULK VOLUME CONTAINMEN QTY: 2162 PROFILE: 0678235

DESIGNATED FACILITY NAME/ADDRESS:

SAFETY-BLEN SYSTEMS, INC.

6628 COAL ROAD

CASPER WY 82604

TSD PHONE: 307-265-7795

FACILITY USEPA ID NO WYR000280588

FACILITY STATE ID NO

Used oil in drums for non-auto generators classified as high risk.
Used oil certification form is required for all customers (initial
sign-up and when status changes).

GENERATOR STATUS

Customer certifies that (i) the above-named materials are properly classified, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and (ii) no material change has occurred either in the characteristics of the waste/material or in the process generating the waste/material. Customer agrees to pay the above charges and to be bound by the terms and conditions (1) set forth in (A) the General Terms and Conditions provided separately to Customer or (B) any SK agreement signed by Customer and SK, and (2) incorporated herein by reference. Unless otherwise indicated in the payment received section, SK is authorized to charge Customer's account for this transaction. Customer certifies that the individual signing this Service Acknowledgement is duly authorized to sign and bind Customer. The following provision is applicable to Safety-Kleen's parts cleaner and paint gun cleaner services: Customer agrees that it will not introduce any substance into the solvent or aqueous cleaning solution, including without limitation any hazardous waste or hazardous waste constituent, except to the extent such introduction is incidental to the normal use of the machine. Customer further agrees that it will not clean parts/paint guns that have been contaminated with or otherwise introduce polychlorinated biphenyls (PCBs), herbicides, pesticides, dioxins or listed hazardous waste into the solvent or aqueous cleaning solution. Safety-Kleen has the capacity and is permitted to accept, store, and/or reclaim the spent parts washer solvent; paint thinners, solvents and paints generated by customer; or dry cleaning filter cartridges, powder, and still residues containing perchloroethylene, petroleum naphtha, or trifluoromethylchloroethane dry cleaning solvents. Customer agrees that it is responsible for properly classifying its waste streams as Used Oil or Nonhazardous Waste in accordance with the provision of 40 CFR 262.11 and applicable state laws. Customer agrees that it will not introduce any non-conforming substance into the SK Property, including without limitation any hazardous waste or hazardous waste constituent, (i.e., polychlorinated biphenyls (PCBs), herbicides, pesticides, dioxins, or listed hazardous wastes) except to the extent such introduction is incidental to the normal use of the SK Property. In the event of the introduction of such non-conforming hazardous waste, Customer agrees that it will be responsible for all costs and remediation expenses related to or arising from the proper management and disposal of the non-conforming waste, including the cost of equipment decontamination and subsequent disposal. If any legal action is commenced because of an alleged dispute, breach, default or misrepresentation, the Customer also agrees that the prevailing party will be entitled to recover reasonable attorney's fees and costs associated with the non-conforming contamination event. Safety-Kleen's failure to screen Customer's material or take a retain sample, in no way constitutes a waiver of Customer's obligation to properly classify its materials. Safety-Kleen relies on Customer's representations and Customer is responsible for informing Safety-Kleen of any process changes that may alter the characteristics of the materials provided. IN THE EVENT OF AN EMERGENCY CALL 24 HR EMERGENCY # 1-800-488-1760 Safety-Kleen Contract # 94138


CUSTOMER / GENERATOR: Jeff McClure
TRANSPORTER: Jim Mason

LAST PAGE

OMEGA ENV000012

BRANCH 7182 - CSG 3

Jim Mason

09/20/13 10:14

PAGE 1

Safety-Kleen Systems, Inc.

2600 N Central Exp., Suite 400
Richardson, TX 75080
800-669-5740
307-265-7795

CUSTOMER# 10179834

OMEGA CAPITAL
130900 Lockwood Rd
Gering NE 68341-5212
PHONE 308-436-0004

REFERENCE NUM.

61855175

SERV WEEK: 2013-39

SERV DATE: 09/20/13 10:14

BILL TO CUSTOMER#
10179834

BILL TO ADDRESS:
OMEGA CAPITAL
130900 Lockwood Rd
Gering NE 68341-5212
PHONE 308-436-0004

PURCHASE ORDER#

TAX EXEMPTION NUM

PRODUCT/SERVICES

SERVICE/ PRODUCT	QTY	UNIT PRICE	TAX	TOTAL CHARGE
078233/ 68654	2162.000	-0.1800	0.00	-389.16
USED OIL SERVICE PREQUAL SERVICE TERM 24 WEEK HALOGEN / CLOR-D-TECT TEST NOT PERFORMED:				
TOTAL SERVICE/PRODUCTS		-0.1800	0.00	0.00
TOTAL CHARGE				0.00
CREDITS				-389.16
TOTAL DUE				-389.16

UNPAID BALANCE THIS RECEIPT

0.00

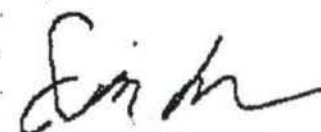
Used oil in drums for non-auto generators classified as high risk.
Used oil certification form is required for all customers (initial
sign-up and when status changes).

GENERATOR STATUS
CESQG: Vehicle

Customer certifies that (i) the above-named materials are properly classified, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and (ii) no material change has occurred either in the characteristics of the waste/material or in the process generating the waste/material. Customer agrees to pay the above charges and to be bound by the terms and conditions (1) set forth in (a) the General Terms and Conditions provided separately to Customer or (b) any SK agreement signed by Customer and SK, and (2) incorporated herein by reference. Unless otherwise indicated in the payment received section, SK is authorized to charge Customer's account for this transaction. Customer certifies that the individual signing this Service Acknowledgement is duly authorized to sign and bind Customer. The following provision is applicable to Safety-Kleen's parts cleaner and paint gun cleaner services: Customer agrees that it will not introduce any substance into the solvent or aqueous cleaning solution, including without limitation any hazardous waste or hazardous waste constituent, except to the extent such introduction is incidental to the normal use of the machine. Customer further agrees that it will not clean parts/paint guns that have been contaminated with or otherwise introduce polychlorinated biphenyls (PCB's), herbicides, pesticides, dioxins or listed hazardous waste into the solvent or aqueous cleaning solution. Safety-Kleen has the capacity and is permitted to accept, store, and/or reclaim the spent parts washer solvent; paint thinners, solvents and paints generated by customer; or dry cleaning filter cartridges, powder, and still residues containing perchloroethylene, petroleum naphtha, or trifluorotrichloroethane dry cleaning solvents. Customer agrees that it is responsible for properly classifying its waste stream as Used Oil or Nonhazardous Waste in accordance with the provision of 40 CFR 262.11 and applicable state laws. Customer agrees that it will not introduce any non-conforming substance into the SK Property, including, without limitation, any hazardous waste or hazardous waste constituent, (i.e., polychlorinated biphenyls ("PCBs"), herbicides, pesticides, dioxins, or listed hazardous wastes) except to the extent such introduction is incidental to the normal use of the SK Property. In the event of the introduction of such non-conforming hazardous waste, Customer agrees that it will be responsible for all costs and remediation expenses related to or arising from the proper management and disposal of the non-conforming waste, including the cost of equipment decontamination and subsequent disposal. If any legal action is commenced because of an alleged dispute, breach, default or misrepresentation, the Customer also agrees that the prevailing party will be entitled to recover reasonable attorney's fees and costs associated with the non-conforming contamination event. Safety-Kleen's failure to screen Customer's material or take a retain sample, in no way constitutes a waiver of Customer's obligation to properly classify its materials. Safety-Kleen relies on Customer's representations and Customer is responsible for informing Safety-Kleen of any process changes that may alter the characteristics of the materials provided. IN THE EVENT OF AN EMERGENCY CALL 24 HR EMERGENCY # 1-800-468-1760 (Safety-Kleen Contract # 54138)



CUSTOMER / GENERATOR: Jeff McClure



SAFETY-KLEEN
LDR NOTIFICATION FORM
11/04/2013 03:33:43
PROJ:11
PA01861

PLANT: 7182
GENERATOR NAME: OMEGA CAPITAL

MANIFEST NO.:
OR SALES SERVICE NO.:
CUST#: 10179034

Shipping #: 211615968
I hereby notify that this shipment contains waste
restricted under 40 CFR part 268 land disposal restrictions (LDR).

A. GENERAL WASTE NOTIFICATION

LDR FORM LINE NO.: 1 MANIFEST PAGE/LINE# 01/001
SK PPL NO.: 0000692580
SKDOT#: 7411654

EPA WASTE CODES & LDR SUBCATEGORIES (IF ANY):
DQ08 TCLP TOXICITY BASED ON TCLP (SW946)

Treatability group: NNW Non-Waste Water

Waste Constituent Notification:

Legend

Number

Constituent

M-CRESOL (DIFFICULT TO DISTINGUISH FROM P-CRESOL)

NOTES

GENERATOR'S AUTHORIZED
SIGNATURE
PLANT: 7182
TOP COPY: GENERATOR

NAME & TITLE
(PRINTED OR TYPED)
CSS: REF:
MIDDLE COPY: FACILITY

DATE
SN:
BOTTOM COPY: TR

OMEGA ENV000014

7102

SK SHIP# 211615968

PA01861

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number CE5028	2. Page 1 of 1	3. Emergency Response Phone 1-800-468-1760	4. Manifest Tracking Number 003186664 SKS		
5. Generator's Name and Mailing Address OMEGA CAPITAL 130900 LOCKWOOD RD GERING NE 69341-5212			Generator's Site Address (if different than mailing address)				
6. Transporter 1 Company Name SAFETY-KLEEN SYSTEMS, INC.			U.S. EPA ID Number TXR000081205				
7. Transporter 2 Company Name			U.S. EPA ID Number				
8. Designated Facility Name and Site Address CLEAN HARBORS DEER TRAIL LLC 108555 E HIGHWAY 36 DEER TRAIL, CO 80105			U.S. EPA ID Number COD991300484				
Facility's Phone: 970-386-2262							
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt/Vol	13. Waste Codes
	X	UN3082, WASTE ENVIRONMENTALLY HAZARDOUS SUBSTANCES, LIQUID, N.O.S., (LEAD), 9, PG III	11 DM		1/96	P	0000
14. Special Handling Instructions and Additional Information TSD: 115591 62238025 10179834 C86							
15. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement (submitted in 40 CFR 262.27(a) if I am a large quantity generator) or (b) if I am a small quantity generator) is true.							
Generator's/Officer's Printed/Typed Name			Signature		Month Day Year 11 13 13		
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.		Port of entry/exit: Date leaving U.S.:				
	17. Transporter Acknowledgment of Receipt of Materials						
	Transporter 1 Printed/Typed Name		Signature		Month Day Year 11 13 13		
Transporter 2 Printed/Typed Name		Signature		Month Day Year			
ALTERNATE FACILITY	18. Discrepancy						
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input checked="" type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
	Manifest Reference Number:						
	18b. Alternate Facility (or Generator) U.S. EPA ID Number						
Facility's Phone:							
18c. Signature of Alternate Facility (or Generator) Month Day Year							
1. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a							
Printed/Typed Name			Signature		Month Day Year		



EZ Profile™

Requested Facility: Conservation Services, Inc. (CSI)☐ Unsure Profile Number: 113245CO☐ Check if there are multiple generator locations. Attach locations.☐ Renewal? Original Profile Number: _____**A. GENERATOR INFORMATION (MATERIAL ORIGIN)**

1. Generator Name: Omega Capital, LLC
 2. Site Address: 1390900 Lockwood Road
 (City, State, ZIP) Gering NE 69341
 3. County: USA
 4. Contact Name: Margaret Ain
 5. Email: main@omegacapital.us.com
 6. Phone: (308) 438-0004 7. Fax: (308) 438-0001
 8. Generator EPA ID: _____ ☒ N/A
 9. State ID: _____ ☒ N/A

B. BILLING INFORMATION☐ SAME AS GENERATOR

1. Billing Name: Enviro Service
 2. Billing Address: 818 South Beltline
 (City, State, ZIP) Scottsbluff NE 69361
 3. Contact Name: Henry Gompert
 4. Email: hgompert@panhandlegeotech.com
 5. Phone: (308) 632-6735 6. Fax: (308) 635-7807
 7. WM Hauled? ☐ Yes ☐ No
 8. P.O. Number: _____

C. MATERIAL INFORMATION1. Common Name: Oily SludgeDescribe Process Generating Material: ☐ See Attached

Repairing locomotive components. The components come to us from the railroads already disassembled, and they are cleaned and the usable parts are salvaged. The oil sludge comes from the locomotive motor parts. The waste is the

2. Material Composition and Contaminants: ☐ See Attached

1. Oil	30-40 %
2. Oil Sludge	60-70 %
3.	
4.	
	≥100%

3. State Waste Codes: _____ ☒ N/A4. Color: Black5. Physical State at 70°F: ☐ Solid ☒ Liquid ☐ Other: _____6. Free Liquid Range Percentage: 5 to 30 ☐ N/A (Solid)7. pH: 6 to 8 ☐ N/A (Solid)8. Strong Odor: ☐ Yes ☒ No Describe: _____9. Flash Point: ☐ <140°F ☐ 140°-199°F ☒ ≥200° ☐ N/A (Solid)**D. REGULATORY INFORMATION****D. REGULATORY INFORMATION**

1. EPA Hazardous Waste? ☐ Yes* ☒ No
 Code: _____
 2. State Hazardous Waste? ☐ Yes ☒ No
 Code: _____
 3. Excluded waste under 40 CFR 261.4 (a) or (b)? ☐ Yes* ☒ No
 4. Contains Underlying Hazardous Constituents? ☐ Yes* ☒ No
 5. Contains benzene and subject to Benzene NESHAP? ☐ Yes* ☒ No
 6. Facility remediation subject to 40 CFR 63 GGGGG? ☐ Yes* ☒ No
 7. CERCLA or State-mandated clean-up? ☐ Yes* ☒ No
 8. NRC or State-regulated radioactive or NORM waste? ☐ Yes* ☒ No
 *If Yes, see Addendum (page 2) for additional questions and space.

9. Contains PCBs? → If Yes, answer a, b and c. ☐ Yes ☒ No
 a. Regulated by 40 CFR 761? ☐ Yes ☐ No
 b. Remediation under 40 CFR 761.61 (a)? ☐ Yes ☐ No
 c. Were PCB imported into the US? ☐ Yes ☐ No
 10. Regulated and/or Untreated Medical/Infectious Waste? ☐ Yes ☒ No
 11. Contains Asbestos? ☐ Yes: Friable ☐ Yes: Non-Friable ☒ No

E. ANALYTICAL AND OTHER REPRESENTATIVE INFORMATION1. Analytical attached ☒ Yes

Please identify applicable samples and/or lab reports:

Analytical report and COC from composite sample of waste stream.

2. Other information attached (such as MSDS)? ☒ Yes**F. SHIPPING AND DOT INFORMATION**

1. ☒ One-Time Event ☐ Repeat Event/Ongoing Business
 2. Estimated Quantity/Unit of Measure: 2000
☐ Tons ☐ Yards ☐ Drums ☒ Gallons ☐ Other: _____
 3. Container Type and Size: totes and drums
 4. USDOT Proper Shipping Name: _____ ☒ N/A

G. GENERATOR CERTIFICATION (PLEASE READ AND CERTIFY BY SIGNATURE)

By signing this EZ Profile™ form, I hereby certify that all information submitted in this and all attached documents contain true and accurate descriptions of this material, and that all relevant information necessary for proper material characterization and to identify known and suspected hazards has been provided. Any analytical data attached was derived from a sample that is representative as defined in 40 CFR 261 - Appendix 1 or by using an equivalent method. All changes occurring in the character of the material (i.e., changes in the process or new analytical) will be identified by the Generator and be disclosed to Waste Management prior to providing the material to Waste Management.

If I am an agent signing on behalf of the Generator, I have confirmed with the Generator that information contained in this Profile is accurate and complete.

Name (Print): Henry Gompert Date: 12/06/2012Title: Environmental SpecialistCompany: Enviro Service Inc.

Certification Signature

THINK GREEN:

QUESTIONS? CALL 800 963 4776 FOR ASSISTANCE

Last Revised June 6, 2012
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OMEGA ENV000016



EZ Profile™ Addendum



Only complete this Addendum if prompted by responses on EZ Profile™ (page 1) or to provide additional information. Sections and question numbers correspond to EZ Profile™.

Profile Number: 11324500

C. MATERIAL INFORMATION

Describe Process Generating Material (Continued from page 1):

If more space is needed, please attach additional pages.

residue oil removed from the parts. It is MOBIL 6800 oil.

Material Composition and Contaminants (Continued from page 1):

If more space is needed, please attach additional pages.

5.	
6.	
7.	
8.	
9.	
10.	
≥100%	

D. REGULATORY INFORMATION

Only questions with a "Yes" response in Section D on the EZ Profile™ form (page 1) need to be answered here.

1. EPA Hazardous Waste

a. Please list all USEPA listed and characteristic waste code numbers:

--

b. Is the material subject to the Alternative Debris standards (40 CFR 268.45)?

☐ Yes ☐ No

c. Is the material subject to the Alternative Soil standards (40 CFR 268.49)? → If Yes, complete question 4.

☐ Yes ☐ No

d. Is the material exempt from Subpart CC Controls (40 CFR 264.1083 and 265.1084)?

☐ Yes ☐ No

→ If Yes, please select one of the following:

☐ Waste has been determined to be LDR exempt (265.1083(c)(4) and 265.1084(c)(4)) based on the fact that it meets all applicable organic treatment standards (including UHCs for D-coded characteristic wastes) or a Specified Technology has been utilized.

☐ Waste does not qualify for a LDR exemption, but the average VOC at the point of origination is <500 ppmw and this determination was based on analytical testing (upload copy of analysis) or generator knowledge.

2. State Hazardous Waste → Please list all state waste codes:

3. Excluded Waste → Please select which of the following categories apply to your material:

☐ De-listed Hazardous Waste

☐ Excluded Waste under 40 CFR 261.4 → Specify Exclusion:

☐ Treated Hazardous Waste Debris

☐ Treated Characteristic Hazardous Waste → If checked, complete question 4.

4. Underlying Hazardous Constituents → Please list all Underlying Hazardous Constituents:

--

5. Benzene NESHAP → Please include benzene concentration and percent water/moisture in chemical composition.

a. Are you a TSDF? → If yes, please complete Benzene NESHAP questionnaire. If not, continue.

b. What is your facility's current total annual benzene quantity in Megagrams?

☐ <1 Mg ☐ 1–9.99 Mg ☐ ≥10 Mg

c. Is this waste soil from remediation at a closed facility?

☐ Yes ☐ No

d. Has material been treated to remove 99% of the benzene or to achieve <10 ppmw?

☐ Yes ☐ No

e. Is material exempt from controls in accordance with 40 CFR 61.342?

☐ Yes ☐ No

→ If yes, specify exemption:

f. Based on your knowledge of your waste and the BWON regulations, do you believe that this waste stream is subject to treatment and control requirements at an off-site TSDF?

☐ Yes ☐ No

6. 40 CFR 63 GGGGG → Does the material contain <500 ppw VOHAPs at the point of determination?

☐ Yes ☐ No

7. CERCLA or State-Mandated clean up → Please submit the Record of Decision or other documentation to assist others in the evaluation for proper disposal.

8. NRC or state regulated radioactive or NORM Waste → Please identify Isotopes and pCi/g:

THINK GREEN:

QUESTIONS? CALL 800 963 4776 FOR ASSISTANCE

Last Revised June 6, 2012
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OMEGA ENV000017



12065 Lebanon Rd.
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(615) 758-5859
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Tax I.D. 62-0814289
Est. 1970

Henry Gompert
Panhandle Geotechnical & Env., Inc.
818 S. Beltline Hwy E
Scottsbluff, NE 69361

Report Summary

Thursday December 06, 2012

Report Number: L608340

Samples Received: 11/29/12

Client Project: RE120759-00

Description: Omega Capital Oily Sludge Waste Profile

The analytical results in this report are based upon information supplied by you, the client, and are for your exclusive use. If you have any questions regarding this data package, please do not hesitate to call.

Entire Report Reviewed By:

T. Alan Harvill, ESC Representative

Laboratory Certification Numbers

A2LA - 1461-01, AIHA - 100789, AL - 40660, CA - 01157CA, CT - PH-0197,
FL - E87487, GA - 923, IN - C-TN-01, KY - 90010, KYUST - 0016,
NC - ENV375/DW21704/B10041, ND - R-140, NJ - TN002, NJ NELAP - TN002,
SC - B4004, TN - 2006, VA - 460132, WV - 233, AZ - 0612,
MN - 047-999-395, NY - 11742, WI - 998093910, NV - TN000032011-1,
TX - T104704245-11-3, OK - 9915, PA - 68-02979, IA Lab #364

Accreditation is only applicable to the test methods specified on each scope of accreditation held by ESC Lab Sciences.

Note: The use of the preparatory EPA Method 3511 is not approved or endorsed by the CA ELAP.

This report may not be reproduced, except in full, without written approval from ESC Lab Sciences. Where applicable, sampling conducted by ESC is performed per guidance provided in laboratory standard operating procedures: 060302, 060303, and 060304.



L.A.B S.C.I.E.N.C.E.S

YOUR LAB OF CHOICE

12065 Lebanon Rd.
Mt. Juliet, TN 37122
(615) 750-5858
1-800-767-5859
Fax (615) 750-5859

Tax I.D. 62-0814289

Est. 1970

REPORT OF ANALYSIS

December 06, 2012

Henry Gompert
Panhandle Geotechnical & Env., Inc.
818 S. Beltline Hwy E
Scottsbluff, NE 69361

Date Received : November 29, 2012
Description : Omega Capital Oily Sludge Waste Profile
Sample ID : OILY SLUDGE
Collected By : Henry Gompert
Collection Date : 11/28/12 09:15

ESC Sample # : L608340-01

Site ID :

Project # : RE120759-00

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
Ignitability	See Footnote		Deg. F	D93/1010A	12/05/12	1
Mercury	BDL	0.020	mg/kg	7471	12/01/12	1
Arsenic	BDL	2.1	mg/kg	6010B	12/03/12	2.1
Barium	37.	0.52	mg/kg	6010B	12/03/12	2.1
Cadmium	BDL	0.52	mg/kg	6010B	12/03/12	2.1
Chromium	8.4	1.0	mg/kg	6010B	12/03/12	2.1
Lead	82.	0.52	mg/kg	6010B	12/03/12	2.1
Selenium	BDL	2.1	mg/kg	6010B	12/03/12	2.1
Silver	1.4	1.0	mg/kg	6010B	12/03/12	2.1
Volatile Organics						
Acetone	BDL	10.	mg/kg	8260B	11/30/12	200
Acrylonitrile	BDL	2.0	mg/kg	8260B	11/30/12	200
Benzene	BDL	0.20	mg/kg	8260B	11/30/12	200
Bromobenzene	BDL	0.20	mg/kg	8260B	11/30/12	200
Bromodichloromethane	BDL	0.20	mg/kg	8260B	11/30/12	200
Bromoform	BDL	0.20	mg/kg	8260B	11/30/12	200
Bromomethane	BDL	1.0	mg/kg	8260B	11/30/12	200
n-Butylbenzene	5.6	0.20	mg/kg	8260B	11/30/12	200
sec-Butylbenzene	3.9	0.20	mg/kg	8260B	11/30/12	200
tert-Butylbenzene	BDL	0.20	mg/kg	8260B	11/30/12	200
Carbon tetrachloride	BDL	0.20	mg/kg	8260B	11/30/12	200
Chlorobenzene	BDL	0.20	mg/kg	8260B	11/30/12	200
Chlorodibromomethane	BDL	0.20	mg/kg	8260B	11/30/12	200
Chloroethane	BDL	1.0	mg/kg	8260B	11/30/12	200
2-Chloroethyl vinyl ether	BDL	10.	mg/kg	8260B	11/30/12	200
Chloroform	BDL	1.0	mg/kg	8260B	11/30/12	200
Chloromethane	BDL	0.50	mg/kg	8260B	11/30/12	200
2-Chlorotoluene	BDL	0.20	mg/kg	8260B	11/30/12	200
4-Chlorotoluene	BDL	0.20	mg/kg	8260B	11/30/12	200
1,2-Dibromo-3-Chloropropane	BDL	1.0	mg/kg	8260B	11/30/12	200
1,2-Dibromoethane	BDL	0.20	mg/kg	8260B	11/30/12	200
Dibromomethane	BDL	0.20	mg/kg	8260B	11/30/12	200
1,2-Dichlorobenzene	BDL	0.20	mg/kg	8260B	11/30/12	200
1,3-Dichlorobenzene	BDL	0.20	mg/kg	8260B	11/30/12	200
1,4-Dichlorobenzene	BDL	0.20	mg/kg	8260B	11/30/12	200
Dichlorodifluoromethane	BDL	1.0	mg/kg	8260B	11/30/12	200
1,1-Dichloroethane	BDL	0.20	mg/kg	8260B	11/30/12	200
1,2-Dichloroethane	BDL	0.20	mg/kg	8260B	11/30/12	200
1,1-Dichloroethene	BDL	0.20	mg/kg	8260B	11/30/12	200
cis-1,2-Dichloroethene	BDL	0.20	mg/kg	8260B	11/30/12	200
trans-1,2-Dichloroethene	BDL	0.20	mg/kg	8260B	11/30/12	200

BDL - Below Detection Limit

Det. Limit - Practical Quantitation Limit (PQL)

L608340-01 (IGNITABILITY) - Did Not Ignite @ 170 F

Page 2 of 14

OMEGA ENV000019



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Est. 1970

REPORT OF ANALYSIS

Henry Gompert
Panhandle Geotechnical & Env., Inc.
818 S. Beltline Hwy E
Scottsbluff, NE 69361

December 06, 2012

Date Received : November 29, 2012
Description : Omega Capital Oily Sludge Waste Profile
Sample ID : OILY SLUDGE
Collected By : Henry Gompert
Collection Date : 11/28/12 09:15

ESC Sample # : L608340-01

Site ID :

Project # : RE120759-00

Parameter	Result	Det. Limit	Units	Method	Date	Dil.
1,2-Dichloropropane	BDL	0.20	mg/kg	8260B	11/30/12	200
1,1-Dichloropropane	BDL	0.20	mg/kg	8260B	11/30/12	200
1,3-Dichloropropane	BDL	0.20	mg/kg	8260B	11/30/12	200
cis-1,3-Dichloropropene	BDL	0.20	mg/kg	8260B	11/30/12	200
trans-1,3-Dichloropropene	BDL	0.20	mg/kg	8260B	11/30/12	200
2,2-Dichloropropane	BDL	0.20	mg/kg	8260B	11/30/12	200
Di-isopropyl ether	BDL	0.20	mg/kg	8260B	11/30/12	200
Ethylbenzene	BDL	0.20	mg/kg	8260B	11/30/12	200
Hexachloro-1,3-butadiene	2.6	0.20	mg/kg	8260B	11/30/12	200
Isopropylbenzene	BDL	0.20	mg/kg	8260B	11/30/12	200
p-Isopropyltoluene	1.4	0.20	mg/kg	8260B	11/30/12	200
2-Butanone (MEK)	2.3	0.20	mg/kg	8260B	11/30/12	200
Methylene Chloride	BDL	2.0	mg/kg	8260B	11/30/12	200
4-Methyl-2-pentanone (MIBK)	BDL	1.0	mg/kg	8260B	11/30/12	200
Methyl tert-butyl ether	BDL	2.0	mg/kg	8260B	11/30/12	200
Naphthalene	BDL	0.20	mg/kg	8260B	11/30/12	200
n-Propylbenzene	3.3	1.0	mg/kg	8260B	11/30/12	200
Styrene	4.2	0.20	mg/kg	8260B	11/30/12	200
1,1,1,2-Tetrachloroethane	BDL	0.20	mg/kg	8260B	11/30/12	200
1,1,2,2-Tetrachloroethane	BDL	0.20	mg/kg	8260B	11/30/12	200
1,1,2-Trichlorotrifluoroethane	BDL	0.20	mg/kg	8260B	11/30/12	200
Tetrachloroethane	BDL	0.20	mg/kg	8260B	11/30/12	200
Toluene	BDL	0.20	mg/kg	8260B	11/30/12	200
1,2,3-Trichlorobenzene	2.2	1.0	mg/kg	8260B	11/30/12	200
1,2,4-Trichlorobenzene	BDL	0.20	mg/kg	8260B	11/30/12	200
1,1,1-Trichloroethane	BDL	0.20	mg/kg	8260B	11/30/12	200
1,1,2-Trichloroethane	BDL	0.20	mg/kg	8260B	11/30/12	200
Trichloroethane	BDL	0.20	mg/kg	8260B	11/30/12	200
Trichlorofluoromethane	BDL	0.20	mg/kg	8260B	11/30/12	200
1,2,3-Trichloropropane	BDL	1.0	mg/kg	8260B	11/30/12	200
1,2,4-Trimethylbenzene	BDL	0.50	mg/kg	8260B	11/30/12	200
1,2,3-Trimethylbenzene	27.	0.20	mg/kg	8260B	11/30/12	200
1,3,5-Trimethylbenzene	10.	0.20	mg/kg	8260B	11/30/12	200
Vinyl chloride	6.6	0.20	mg/kg	8260B	11/30/12	200
Xylenes, Total	BDL	0.20	mg/kg	8260B	11/30/12	200
Surrogate Recovery	12.	0.60	mg/kg	8260B	11/30/12	200
Toluene-d8	98.3					
Dibromofluoromethane	95.6		1 Rec.	8260B	11/30/12	200
4-Bromofluorobenzene	115.		1 Rec.	8260B	11/30/12	200

BDL - Below Detection Limit

Det. Limit - Practical Quantitation Limit (PQL)

Note:

The reported analytical results relate only to the sample submitted.

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Reported: 12/05/12 17:16 Revised: 12/06/12 09:39
L608340-01 (IGNITABILITY) - Did Not Ignite @ 170 F

Attachment A
List of Analytes with QC Qualifiers

Sample Number	Work Group	Sample Type	Analyte	Run ID	Qualifier
L608340-01	WG625747	SAMP	Arsenic	R2463558	O
	WG625747	SAMP	Cadmium	R2463558	O
	WG625747	SAMP	Selenium	R2463558	O

Attachment B
Explanation of QC Qualifier Codes

Qualifier	Meaning
0	(ESC) Sample diluted due to matrix interferences that impaired the ability to make an accurate analytical determination. The detection limit is elevated in order to reflect the necessary dilution.

Qualifier Report Information

ESC utilizes sample and result qualifiers as set forth by the EPA Contract Laboratory Program and as required by most certifying bodies including NELAP. In addition to the EPA qualifiers adopted by ESC, we have implemented ESC qualifiers to provide more information pertaining to our analytical results. Each qualifier is designated in the qualifier explanation as either EPA or ESC. Data qualifiers are intended to provide the ESC client with more detailed information concerning the potential bias of reported data. Because of the wide range of constituents and variety of matrices incorporated by most EPA methods, it is common for some compounds to fall outside of established ranges. These exceptions are evaluated and all reported data is valid and useable "unless qualified as 'R' (Rejected)."

Definitions

- Accuracy** - The relationship of the observed value of a known sample to the true value of a known sample. Represented by percent recovery and relevant to samples such as: control samples, matrix spike recoveries, surrogate recoveries, etc.
- Precision** - The agreement between a set of samples or between duplicate samples. Relates to how close together the results are and is represented by Relative Percent Difference.
- Surrogate** - Organic compounds that are similar in chemical composition, extraction, and chromatography to analytes of interest. The surrogates are used to determine the probable response of the group of analytes that are chemically related to the surrogate compound. Surrogates are added to the sample and carried through all stages of preparation and analyses.
- TIC** - Tentatively Identified Compound: Compounds detected in samples that are not target compounds, internal standards, system monitoring compounds, or surrogates.



YOUR LAB OF CHOICE

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Fax (615) 758-5859

Tax: I.D. 62-0814269

Est. 1970

December 06, 2012

Analyte	Result	Laboratory Blank / Units & Rec	Limit	Batch	Date Analyzed
Mercury	< .02	mg/kg		WG625553	11/30/12 12:24
1,1,1,2-Tetrachloroethane	< .001	mg/kg		WG625553	11/30/12 12:24
1,1,1-Trichloroethane	< .001	mg/kg		WG625553	11/30/12 12:24
1,1,2,2-Tetrachloroethane	< .001	mg/kg		WG625553	11/30/12 12:24
1,1,2-Trichloroethane	< .001	mg/kg		WG625553	11/30/12 12:24
1,1,2-Trichlorotrifluoroethane	< .001	mg/kg		WG625553	11/30/12 12:24
1,1-Dichloroethane	< .001	mg/kg		WG625553	11/30/12 12:24
1,1-Dichloroethane	< .001	mg/kg		WG625553	11/30/12 12:24
1,1-Dichloropropane	< .001	mg/kg		WG625553	11/30/12 12:24
1,2,3-Trichlorobenzene	< .001	mg/kg		WG625553	11/30/12 12:24
1,2,3-Trichloropropane	< .0025	mg/kg		WG625553	11/30/12 12:24
1,2,3-Trimethylbenzene	< .001	mg/kg		WG625553	11/30/12 12:24
1,2,4-Trichlorobenzene	< .001	mg/kg		WG625553	11/30/12 12:24
1,2,4-Trimethylbenzene	< .001	mg/kg		WG625553	11/30/12 12:24
1,2-Dibromo-3-Chloropropane	< .005	mg/kg		WG625553	11/30/12 12:24
1,2-Dibromoethane	< .001	mg/kg		WG625553	11/30/12 12:24
1,2-Dichlorobenzene	< .001	mg/kg		WG625553	11/30/12 12:24
1,2-Dichloroethane	< .001	mg/kg		WG625553	11/30/12 12:24
1,2-Dichloropropane	< .001	mg/kg		WG625553	11/30/12 12:24
1,3,5-Trimethylbenzene	< .001	mg/kg		WG625553	11/30/12 12:24
1,3-Dichlorobenzene	< .001	mg/kg		WG625553	11/30/12 12:24
1,3-Dichloropropane	< .001	mg/kg		WG625553	11/30/12 12:24
1,4-Dichlorobenzene	< .001	mg/kg		WG625553	11/30/12 12:24
2,2-Dichloropropane	< .001	mg/kg		WG625553	11/30/12 12:24
2-Butanone (MEK)	< .01	mg/kg		WG625553	11/30/12 12:24
2-Chloroethyl vinyl ether	< .05	mg/kg		WG625553	11/30/12 12:24
2-Chlorotoluene	< .001	mg/kg		WG625553	11/30/12 12:24
4-Chlorotoluene	< .001	mg/kg		WG625553	11/30/12 12:24
4-Methyl-2-pentanone (MIBK)	< .01	mg/kg		WG625553	11/30/12 12:24
Acetone	< .05	mg/kg		WG625553	11/30/12 12:24
Acrylonitrile	< .01	mg/kg		WG625553	11/30/12 12:24
Benzene	< .001	mg/kg		WG625553	11/30/12 12:24
Bromobenzene	< .001	mg/kg		WG625553	11/30/12 12:24
Bromodichloromethane	< .001	mg/kg		WG625553	11/30/12 12:24
Bromoform	< .001	mg/kg		WG625553	11/30/12 12:24
Bromomethane	< .005	mg/kg		WG625553	11/30/12 12:24
Carbon tetrachloride	< .001	mg/kg		WG625553	11/30/12 12:24
Chlorobenzene	< .001	mg/kg		WG625553	11/30/12 12:24
Chlorodibromomethane	< .001	mg/kg		WG625553	11/30/12 12:24
Chloroethane	< .005	mg/kg		WG625553	11/30/12 12:24
Chloroform	< .005	mg/kg		WG625553	11/30/12 12:24
Chloromethane	< .0025	mg/kg		WG625553	11/30/12 12:24
cis-1,2-Dichloroethane	< .001	mg/kg		WG625553	11/30/12 12:24
cis-1,3-Dichloropropane	< .001	mg/kg		WG625553	11/30/12 12:24
Di-isopropyl ether	< .001	mg/kg		WG625553	11/30/12 12:24
Dibromomethane	< .001	mg/kg		WG625553	11/30/12 12:24
Dichlorodifluoromethane	< .005	mg/kg		WG625553	11/30/12 12:24
Ethylbenzene	< .001	mg/kg		WG625553	11/30/12 12:24
Hexachloro-1,3-butadiene	< .001	mg/kg		WG625553	11/30/12 12:24
Isopropylbenzene	< .001	mg/kg		WG625553	11/30/12 12:24
Methyl tert-butyl ether	< .001	mg/kg		WG625553	11/30/12 12:24
Methylene Chloride	< .005	mg/kg		WG625553	11/30/12 12:24
n-Butylbenzene	< .001	mg/kg		WG625553	11/30/12 12:24
n-Propylbenzene	< .001	mg/kg		WG625553	11/30/12 12:24
Naphthalene	< .005	mg/kg		WG625553	11/30/12 12:24
p-Isopropyltoluene	< .001	mg/kg		WG625553	11/30/12 12:24
sec-Butylbenzene	< .001	mg/kg		WG625553	11/30/12 12:24

* Performance of this Analyte is outside of established criteria.
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Est. 1970

December 06, 2012

Analyte	Result	Units	% Rec	Limit	Batch	Date Analyzed
Styrene	< .001	mg/kg			WG625553	11/30/12 12:24
tert-Butylbenzene	< .001	mg/kg			WG625553	11/30/12 12:24
Tetrachloroethene	< .001	mg/kg			WG625553	11/30/12 12:24
Toluene	< .005	mg/kg			WG625553	11/30/12 12:24
trans-1,2-Dichloroethene	< .001	mg/kg			WG625553	11/30/12 12:24
trans-1,3-Dichloropropene	< .001	mg/kg			WG625553	11/30/12 12:24
Trichloroethene	< .001	mg/kg			WG625553	11/30/12 12:24
Trichlorofluoromethane	< .005	mg/kg			WG625553	11/30/12 12:24
Vinyl chloride	< .001	mg/kg			WG625553	11/30/12 12:24
Xylenes, Total	< .001	mg/kg			WG625553	11/30/12 12:24
4-Bromofluorobenzene		% Rec.	97.52	67-133	WG625553	11/30/12 12:24
Dibromofluoromethane		% Rec.	97.39	72-135	WG625553	11/30/12 12:24
Toluene-d8		% Rec.	86.30	90-113	WG625553	11/30/12 12:24
Arsenic	< 1	mg/kg			WG625747	12/03/12 17:20
Barium	< .25	mg/kg			WG625747	12/03/12 17:20
Cadmium	< .25	mg/kg			WG625747	12/03/12 17:20
Chromium	< .5	mg/kg			WG625747	12/03/12 17:20
Lead	< .25	mg/kg			WG625747	12/03/12 17:20
Selenium	< 1	mg/kg			WG625747	12/03/12 17:20
Silver	< .5	mg/kg			WG625747	12/03/12 17:20

Analyte	Units	Result	Duplicate	RPD	Limit	Ref Samp	Batch
Mercury	mg/kg	0.0570	0.0532	6.46	20	L608349-07	WG625597
Arsenic	mg/kg	12.0	3.20	116.4	20	L608512-01	WG625747
Barium	mg/kg	2400	1900	23.4	20	L608512-01	WG625747
Chromium	mg/kg	34.0	32.0	6.06	20	L608512-01	WG625747
Lead	mg/kg	25.0	26.0	3.92	20	L608512-01	WG625747
Selenium	mg/kg	2.30	70.0	30.0	20	L608512-01	WG625747
Silver	mg/kg	1.50	2.40	46.2	20	L608512-01	WG625747
Cadmium	mg/kg	0	0	0	20	L608512-01	WG625747
Ignitability	Deg. F	0	0	0	10	L608730-01	WG626219

Analyte	Units	Known Val	Result	% Rec	Limit	Batch
Mercury	mg/kg	12.4	11.7	110.7	71.6-127.7	WG625597
1,1,1,2-Tetrachloroethane	mg/kg	.025	0.0244	97.6	77-129	WG625553
1,1,1-Trichloroethane	mg/kg	.025	0.0243	97.1	70-127	WG625553
1,1,2,2-Tetrachloroethane	mg/kg	.025	0.0239	95.7	76-133	WG625553
1,1,2-Trichloroethane	mg/kg	.025	0.0245	97.8	79-123	WG625553
1,1,2-Trichlorotrifluoroethane	mg/kg	.025	0.0248	99.5	52-145	WG625553
1,1-Dichloroethane	mg/kg	.025	0.0239	95.4	74-121	WG625553
1,1-Dichloroethene	mg/kg	.025	0.0249	99.7	53-135	WG625553
1,1-Dichloropropene	mg/kg	.025	0.0246	98.6	67-127	WG625553
1,2,3-Trichlorobenzene	mg/kg	.025	0.0240	96.1	74-131	WG625553
1,2,3-Trichloropropene	mg/kg	.025	0.0246	98.5	75-135	WG625553
1,2,3-Trimethylbenzene	mg/kg	.025	0.0244	97.6	76-129	WG625553
1,2,4-Trichlorobenzene	mg/kg	.025	0.0240	96.2	72-130	WG625553
1,2,4-Trimethylbenzene	mg/kg	.025	0.0245	97.9	75-131	WG625553

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L.A.B. S.C.I.E.N.C.E.S

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Analyte	Units	Laboratory Control Known Val	Sample Result	% Rec	Limit	Batch
1,2-Dibromo-3-Chloropropane	mg/kg	.025	0.0249	99.7	55-142	WG625553
1,2-Dibromothane	mg/kg	.025	0.0245	98.1	77-126	WG625553
1,2-Dichlorobenzene	mg/kg	.025	0.0238	95.1	80-123	WG625553
1,2-Dichloroethane	mg/kg	.025	0.0227	90.9	70-128	WG625553
1,2-Dichloropropane	mg/kg	.025	0.0234	93.7	74-125	WG625553
1,3,5-Trimethylbenzene	mg/kg	.025	0.0248	99.0	77-129	WG625553
1,3-Dichlorobenzene	mg/kg	.025	0.0238	95.0	76-128	WG625553
1,3-Dichloropropene	mg/kg	.025	0.0238	95.0	77-118	WG625553
1,4-Dichlorobenzene	mg/kg	.025	0.0230	91.9	77-119	WG625553
2,2-Dichloropropane	mg/kg	.025	0.0240	96.1	60-132	WG625553
2-Butanone (MEK)	mg/kg	.125	0.128	103.	56-146	WG625553
2-Chloroethyl vinyl ether	mg/kg	.125	0.134	107.	17-179	WG625553
2-Chlorotoluene	mg/kg	.025	0.0236	94.3	76-125	WG625553
4-Chlorotoluene	mg/kg	.025	0.0238	95.1	76-125	WG625553
4-Methyl-2-pentanone (MIBK)	mg/kg	.125	0.129	102.	55-148	WG625553
Acetone	mg/kg	.125	0.102	81.6	47-155	WG625553
Acrylonitrile	mg/kg	.125	0.123	98.4	50-155	WG625553
Benzene	mg/kg	.025	0.0246	98.3	72-120	WG625553
Bromobenzene	mg/kg	.025	0.0232	92.7	74-122	WG625553
Bromodichloromethane	mg/kg	.025	0.0236	94.4	74-129	WG625553
Ethylbenzene	mg/kg	.025	0.0252	101.	62-137	WG625553
Bromochloromethane	mg/kg	.025	0.0276	110.	38-180	WG625553
Carbon tetrachloride	mg/kg	.025	0.0237	94.7	62-130	WG625553
Chlorobenzene	mg/kg	.025	0.0240	96.1	77-124	WG625553
Chlorodibromomethane	mg/kg	.025	0.0245	97.8	74-128	WG625553
Chloroethane	mg/kg	.025	0.0251	100.	46-173	WG625553
Chloroform	mg/kg	.025	0.0241	96.5	76-132	WG625553
Chloromethane	mg/kg	.025	0.0238	95.4	49-163	WG625553
cis-1,2-Dichloroethene	mg/kg	.025	0.0252	101.	73-123	WG625553
cis-1,3-Dichloropropene	mg/kg	.025	0.0249	99.7	73-126	WG625553
Di-isopropyl ether	mg/kg	.025	0.0233	93.1	64-131	WG625553
Dibromomethane	mg/kg	.025	0.0247	98.8	75-127	WG625553
Dichlorodifluoromethane	mg/kg	.025	0.0241	96.5	30-177	WG625553
Ethylbenzene	mg/kg	.025	0.0246	98.3	76-126	WG625553
Hexachloro-1,3-butadiene	mg/kg	.025	0.0244	97.8	71-134	WG625553
Isopropylbenzene	mg/kg	.025	0.0247	99.0	70-128	WG625553
Methyl tert-butyl ether	mg/kg	.025	0.0249	99.7	66-127	WG625553
Methylene Chloride	mg/kg	.025	0.0236	94.2	67-124	WG625553
n-Butylbenzene	mg/kg	.025	0.0246	98.5	71-133	WG625553
n-Propylbenzene	mg/kg	.025	0.0238	95.4	76-126	WG625553
Naphthalene	mg/kg	.025	0.0248	99.3	68-136	WG625553
p-Isopropyltoluene	mg/kg	.025	0.0251	101.	75-134	WG625553
sec-Butylbenzene	mg/kg	.025	0.0250	100.	75-132	WG625553
Styrene	mg/kg	.025	0.0250	100.	68-148	WG625553
tert-Butylbenzene	mg/kg	.025	0.0253	101.	75-132	WG625553
Tetrachloroethene	mg/kg	.025	0.0240	95.8	70-131	WG625553
Toluene	mg/kg	.025	0.0241	96.5	74-155	WG625553
trans-1,2-Dichloroethene	mg/kg	.025	0.0251	101.	63-126	WG625553
trans-1,3-Dichloropropene	mg/kg	.025	0.0244	97.4	68-126	WG625553
Trichloroethene	mg/kg	.025	0.0252	101.	75-121	WG625553
Trichlorofluoromethane	mg/kg	.025	0.0252	101.	48-170	WG625553
Vinyl chloride	mg/kg	.025	0.0245	97.8	54-144	WG625553
Xylenes, Total	mg/kg	.075	0.0740	98.6	76-126	WG625553
4-Bromofluorobenzene				94.85	67-133	WG625553
Dibromofluoromethane				97.05	72-135	WG625553
Toluene-d8				97.09	90-113	WG625553

Arsenic, mg/kg 237 210 89.6 83-117 WG625747

* Performance of this Analyte is outside of established criteria.

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Est. 1970

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Analyte	Units	Laboratory Known Val	Control Sample Result	% Rec	Limit	Batch
Barium	mg/kg	252	238	94.4	84.1-116	WG625747
Cadmium	mg/kg	191	166	86.9	83.2-117	WG625747
Chromium	mg/kg	128	119	93.0	81.3-118	WG625747
Lead	mg/kg	103	92.5	89.8	83.1-117	WG625747
Selenium	mg/kg	110	101	91.8	78.7-122	WG625747
Silver	mg/kg	47.3	39.4	83.3	66.2-134	WG625747
Ignitability	Dec. F	82	83.0	101	93-107	WG626219

Analyte	Units	Laboratory Result	Control Ref	Sample Duplicate %Rec	Limit	RPD	Limit	Batch
1,1,1,2-Tetrachloroethane	mg/kg	0.0259	0.0244	103	77-129	5.86	20	WG625553
1,1,1-Trichloroethane	mg/kg	0.0251	0.0243	100	70-127	3.35	20	WG625553
1,1,2,2-Tetrachloroethane	mg/kg	0.0260	0.0239	104	76-133	8.33	20	WG625553
1,1,2-Trichloroethane	mg/kg	0.0252	0.0245	101	79-129	2.86	20	WG625553
1,1,2-Trichlorotrifluoroethane	mg/kg	0.0261	0.0249	104	52-145	4.90	20	WG625553
1,1-Dichloroethane	mg/kg	0.0247	0.0239	99.0	74-121	3.45	20	WG625553
1,1-Dichloropropene	mg/kg	0.0265	0.0249	106	53-135	6.29	20	WG625553
1,2,3-Trichlorobenzene	mg/kg	0.0255	0.0246	102	67-127	3.53	20	WG625553
1,2,3-Trichloropropane	mg/kg	0.0258	0.0240	103	74-131	7.22	20	WG625553
1,2,3-Trimethylbenzene	mg/kg	0.0258	0.0246	103	75-135	4.55	20	WG625553
1,2,4-Trichlorobenzene	mg/kg	0.0251	0.0244	100	76-128	2.93	20	WG625553
1,2,4-Trimethylbenzene	mg/kg	0.0260	0.0240	104	72-130	7.75	20	WG625553
1,2-Dibromo-3-Chloropropane	mg/kg	0.0263	0.0245	105	75-131	7.10	20	WG625553
1,2-Dibromobenzene	mg/kg	0.0265	0.0249	106	55-142	6.01	20	WG625553
1,2-Dichloroethane	mg/kg	0.0252	0.0245	101	77-126	2.81	20	WG625553
1,2-Dichloropropene	mg/kg	0.0246	0.0238	98.0	80-123	3.30	20	WG625553
1,3,5-Trimethylbenzene	mg/kg	0.0231	0.0227	92.0	70-128	1.60	20	WG625553
1,3-Dichlorobenzene	mg/kg	0.0245	0.0234	98.0	74-125	4.39	20	WG625553
1,3-Dichloropropane	mg/kg	0.0262	0.0248	105	77-129	5.70	20	WG625553
1,3-Dichlorobenzene	mg/kg	0.0250	0.0238	100	76-128	5.30	20	WG625553
1,4-Dichlorobenzene	mg/kg	0.0241	0.0238	96.0	77-118	1.42	20	WG625553
2,2-Dichloropropane	mg/kg	0.0240	0.0230	96.0	77-119	4.30	20	WG625553
2-Butanone (MEK)	mg/kg	0.0267	0.0240	107	60-132	10.4	20	WG625553
2-Chloroethyl vinyl ether	mg/kg	0.126	0.128	101	56-146	1.71	20	WG625553
2-Chlorotoluene	mg/kg	0.128	0.134	103	17-179	14.31	22	WG625553
4-Chlorotoluene	mg/kg	0.0251	0.0236	100	76-125	6.31	20	WG625553
4-Methyl-2-pentanone (MIBK)	mg/kg	0.0250	0.0238	100	76-125	4.96	20	WG625553
Acetone	mg/kg	0.131	0.128	105	55-148	2.83	20	WG625553
Acrylonitrile	mg/kg	0.102	0.102	82.0	47-155	0.0600	22	WG625553
Benzene	mg/kg	0.129	0.123	102	50-155	3.78	20	WG625553
Bromobenzene	mg/kg	0.0252	0.0246	101	72-120	2.37	20	WG625553
Bromodichloromethane	mg/kg	0.0243	0.0232	97.0	74-122	4.82	20	WG625553
Bromofluoride	mg/kg	0.0245	0.0236	98.0	74-128	3.55	20	WG625553
Bromoethane	mg/kg	0.0256	0.0252	102	62-137	1.37	20	WG625553
Carbon tetrachloride	mg/kg	0.0285	0.0276	114	38-180	3.26	20	WG625553
Chlorobenzene	mg/kg	0.0249	0.0237	100	62-130	4.97	20	WG625553
Chlorodibromomethane	mg/kg	0.0252	0.0240	101	77-124	4.64	20	WG625553
Chloroethane	mg/kg	0.0259	0.0245	103	74-128	5.57	20	WG625553
Chloroform	mg/kg	0.0261	0.0251	104	46-173	4.01	20	WG625553
Chloromethane	mg/kg	0.0249	0.0241	100	76-122	3.25	20	WG625553
cis-1,2-Dichloroethene	mg/kg	0.0249	0.0238	100	49-143	4.45	20	WG625553
cis-1,3-Dichloropropene	mg/kg	0.0258	0.0252	103	73-123	3.25	20	WG625553
Di-isopropyl ether	mg/kg	0.0250	0.0249	100	73-126	0.510	20	WG625553
Dibromomethane	mg/kg	0.0244	0.0233	97.0	64-131	4.63	20	WG625553
Dichlorodifluoromethane	mg/kg	0.0234	0.0247	101	75-127	2.65	20	WG625553
Dichlorodifluoromethane	mg/kg	0.0251	0.0241	100	50-177	3.64	20	WG625553

* Performance of this Analyte is outside of established criteria.
For additional information, please see page 2.

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L.A.B. S.C.I.E.N.C.E.S.

YOUR LAB OF CHOICE

Parhandle Geotechnical & Env., Inc.
Henry Gompert
818 S. Balclutha Hwy E
Scottsbluff, NE 69361

Quality Assurance Report
Level II

L608340

12065 Lebanon Rd.
Mt. Juliet, TN 37122
(615) 758-5858
1-800-767-5859
Fax (615) 758-5859

Tax I.D. 62-0014289

Est. 1970

December 06, 2012

Analyte	Units	Result	Ref	Rec	Limit	RPD	Limit	Batch
Ethylbenzene	mg/kg	0.0254	0.0246	102	76-126	3.39	20	WG625553
Hexachloro-1,3-butadiene	mg/kg	0.0255	0.0244	102	71-134	4.12	20	WG625553
Isopropylbenzene	mg/kg	0.0263	0.0247	105	70-128	6.29	20	WG625553
Methyl tert-butyl ether	mg/kg	0.0261	0.0249	104	66-127	4.72	20	WG625553
Methylene Chloride	mg/kg	0.0247	0.0236	99.0	67-124	4.93	20	WG625553
n-Butylbenzene	mg/kg	0.0256	0.0246	102	71-133	3.76	20	WG625553
n-Propylbenzene	mg/kg	0.0254	0.0238	102	76-126	6.36	20	WG625553
Naphthalene	mg/kg	0.0267	0.0248	107	68-136	7.47	20	WG625553
p-Isopropyltoluene	mg/kg	0.0266	0.0251	106	75-134	5.67	20	WG625553
sec-Butylbenzene	mg/kg	0.0261	0.0250	104	75-132	4.22	20	WG625553
Styrene	mg/kg	0.0262	0.0250	105	68-148	4.81	20	WG625553
tert-Butylbenzene	mg/kg	0.0270	0.0253	108	75-132	6.47	20	WG625553
Tetrachloroethane	mg/kg	0.0254	0.0240	102	70-131	6.01	20	WG625553
Toluene	mg/kg	0.0242	0.0241	97.0	74-155	0.460	20	WG625553
trans-1,2-Dichloroethane	mg/kg	0.0263	0.0251	105	63-126	4.44	20	WG625553
trans-1,3-Dichloropropene	mg/kg	0.0243	0.0244	97.0	68-126	0.0100	20	WG625553
Trichloroethane	mg/kg	0.0262	0.0252	105	75-121	4.08	20	WG625553
Trichlorofluoromethane	mg/kg	0.0262	0.0252	105	48-170	3.92	20	WG625553
Vinyl Chloride	mg/kg	0.0255	0.0245	102	54-144	4.34	20	WG625553
Xylenes, Total	mg/kg	0.0767	0.0740	105	76-126	6.15	20	WG625553
4-Bromofluorobenzene				96.94	67-133			WG625553
Dibromofluoromethane				98.08	72-135			WG625553
Toluene-d8				96.44	90-113			WG625553
Ignitability	Deg. F	84.0	83.0	102	93-107	1.20	20	WG626219

Analyte	Units	MS Res	Ref	Rec	TV	% Rec	Limit	Ref Samp	Batch
Mercury	mg/kg	0.291	0.0532	25	95.9	40-120	1609349-07		WG625597
1,1,1,2-Tetrachloroethane	mg/kg	0.116	0	0.25	93.2	49-135	1609374-02		WG625553
1,1,1-Trichloroethane	mg/kg	0.127	0	0.25	90.3	43-142	1609374-02		WG625553
1,1,2,2-Tetrachloroethane	mg/kg	0.119	0	0.25	95.2	42-147	1609374-02		WG625553
1,1,2-Trichloroethane	mg/kg	0.118	0	0.25	94.2	51-134	1609374-02		WG625553
1,1,2-Trichlorotrifluoroethane	mg/kg	0.123	0	0.25	98.2	25-156	1609374-02		WG625553
1,1-Dichloroethane	mg/kg	0.124	0	0.25	99.2	50-131	1609374-02		WG625553
1,1-Dichloroethane	mg/kg	0.128	0	0.25	102	29-145	1609374-02		WG625553
1,1-Dichloropropane	mg/kg	0.112	0	0.25	89.7	40-136	1609374-02		WG625553
1,2,3-Trichlorobenzene	mg/kg	0.0478	0	0.25	38.3	13-142	1609374-02		WG625553
1,2,3-Trichloropropene	mg/kg	0.117	0	0.25	93.4	41-149	1609374-02		WG625553
1,2,3-Trimethylbenzene	mg/kg	0.0835	0.009467	0.25	66.4	33-146	1609374-02		WG625553
1,2,4-Trichlorobenzene	mg/kg	0.0472	0	0.25	37.7	12-140	1609374-02		WG625553
1,2,4-Trimethylbenzene	mg/kg	0.0867	0	0.25	69.3	29-143	1609374-02		WG625553
1,2-Dibromo-3-Chloropropane	mg/kg	0.109	0	0.25	87.6	29-151	1609374-02		WG625553
1,3-Dibromobenzene	mg/kg	0.109	0	0.25	87.5	48-133	1609374-02		WG625553
1,2-Dichlorobenzene	mg/kg	0.0764	0	0.25	61.2	37-136	1609374-02		WG625553
1,2-Dichloroethane	mg/kg	0.108	0	0.25	86.4	49-131	1609374-02		WG625553
1,2-Dichloropropane	mg/kg	0.116	0	0.25	92.9	50-132	1609374-02		WG625553
1,3,5-Trimethylbenzene	mg/kg	0.0850	0	0.25	68.0	29-144	1609374-02		WG625553
1,3-Dichlorobenzene	mg/kg	0.0759	0	0.25	60.7	26-140	1609374-02		WG625553
1,3-Dichloropropene	mg/kg	0.109	0	0.25	87.1	50-126	1609374-02		WG625553
1,4-Dichlorobenzene	mg/kg	0.0716	0	0.25	57.3	34-132	1609374-02		WG625553
2,2-Dichloropropene	mg/kg	0.139	0	0.25	112	35-148	1609374-02		WG625553
2-Butanone (MEK)	mg/kg	0.622	0	1.25	99.5	40-149	1609374-02		WG625553
2-Chloroethyl vinyl ether	mg/kg	0.563	0	1.25	90.0	10-173	1609374-02		WG625553
2-Chlorotoluene	mg/kg	0.0852	0	0.25	66.2	34-136	1609374-02		WG625553

* Performance of this Analyte is outside of established criteria.

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YOUR LAB OF CHOICE

Panhandle Geotechnical & Env., Inc.
Henry Comport
918 S. Beltline Hwy E
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Quality Assurance Report
Level II

L608340

December 06, 2012

12065 Lebanon Rd.
Mt. Juliet, TN 37122
(615) 758-5858
1-800-767-5859
Fax (615) 758-5859

Tax I.D. 62-0814289

Est. 1970

Analyte	Units	Matrix Spike				% Rec	Limit	Ref Samp	Batch
		MS Res	Ref Res	TV	TV				
4-Chlorotoluene	mg/kg	0.0837	0	0.025	67.0	31-137	L608374-02	WG625553	
4-Methyl-2-pentanone (MIBK)	mg/kg	0.603	0	0.125	96.5	37-153	L608374-02	WG625553	
Acetone	mg/kg	0.633	0	0.125	101.	10-177	L608374-02	WG625553	
Acrylonitrile	mg/kg	0.566	0	0.125	90.5	33-159	L608374-02	WG625553	
Benzene	mg/kg	0.119	0	0.025	95.0	44-131	L608374-02	WG625553	
Bromobenzene	mg/kg	0.0888	0	0.025	71.0	36-132	L608374-02	WG625553	
Bromodichloromethane	mg/kg	0.113	0	0.025	90.2	48-134	L608374-02	WG625553	
Bromofom	mg/kg	0.109	0	0.025	87.4	34-141	L608374-02	WG625553	
Bromomethane	mg/kg	0.139	0	0.025	111.	19-173	L608374-02	WG625553	
Carbon tetrachloride	mg/kg	0.120	0	0.025	96.4	36-140	L608374-02	WG625553	
Chlorobenzene	mg/kg	0.100	0	0.025	80.4	42-133	L608374-02	WG625553	
Chlorodibromomethane	mg/kg	0.114	0	0.025	91.4	45-135	L608374-02	WG625553	
Chloroethane	mg/kg	0.135	0	0.025	108.	16-178	L608374-02	WG625553	
Chloroform	mg/kg	0.123	0	0.025	90.1	52-130	L608374-02	WG625553	
Chloromethane	mg/kg	0.128	0	0.025	102.	28-147	L608374-02	WG625553	
cis-1,2-Dichloroethane	mg/kg	0.118	0	0.025	94.0	53-128	L608374-02	WG625553	
cis-1,3-Dichloropropene	mg/kg	0.107	0	0.025	85.9	46-131	L608374-02	WG625553	
Di-isopropyl ether	mg/kg	0.123	0	0.025	58.2	46-134	L608374-02	WG625553	
Dibromomethane	mg/kg	0.113	0	0.025	90.0	51-133	L608374-02	WG625553	
Dichlorodifluoromethane	mg/kg	0.135	0	0.025	108.	12-179	L608374-02	WG625553	
Ethylbenzene	mg/kg	0.105	0	0.025	84.2	30-139	L608374-02	WG625553	
Hexachloro-1,3-butadiene	mg/kg	0.0253	0	0.025	20.2	10-147	L608374-02	WG625553	
Isopropylbenzene	mg/kg	0.0936	0	0.025	74.8	34-137	L608374-02	WG625553	
Methyl tert-butyl ether	mg/kg	0.128	0	0.025	102.	45-134	L608374-02	WG625553	
Methylene Chloride	mg/kg	0.117	0	0.025	93.8	41-133	L608374-02	WG625553	
n-Butylbenzene	mg/kg	0.0496	0	0.025	39.7	19-149	L608374-02	WG625553	
n-Propylbenzene	mg/kg	0.0795	0	0.025	63.6	27-142	L608374-02	WG625553	
Naphthalene	mg/kg	0.0725	0	0.025	58.0	19-146	L608374-02	WG625553	
p-Isopropyltoluene	mg/kg	0.0647	0	0.025	51.8	21-150	L608374-02	WG625553	
sec-Butylbenzene	mg/kg	0.0622	0	0.025	49.8	23-148	L608374-02	WG625553	
Styrene	mg/kg	0.100	0	0.025	80.2	30-156	L608374-02	WG625553	
tert-Butylbenzene	mg/kg	0.0755	0	0.025	60.4	32-146	L608374-02	WG625553	
Tetrachloroethene	mg/kg	0.0964	0	0.025	77.1	35-139	L608374-02	WG625553	
Toluene	mg/kg	0.109	0	0.025	87.4	43-127	L608374-02	WG625553	
trans-1,2-Dichloroethene	mg/kg	0.115	0	0.025	91.9	41-132	L608374-02	WG625553	
trans-1,3-Dichloropropene	mg/kg	0.0996	0	0.025	79.7	43-129	L608374-02	WG625553	
Trichloroethane	mg/kg	0.114	0	0.025	91.4	42-136	L608374-02	WG625553	
Trichlorofluoromethane	mg/kg	0.136	0	0.025	109.	20-178	L608374-02	WG625553	
Vinyl Chloride	mg/kg	0.127	0	0.025	102.	30-157	L608374-02	WG625553	
Xylenes, Total	mg/kg	0.314	0	0.025	83.7	38-137	L608374-02	WG625553	
4-Bromofluorobenzene	mg/kg				98.33	67-133	L608374-02	WG625553	
Dibromofluoromethane	mg/kg				96.81	72-135	L608374-02	WG625553	
Toluene-d8	mg/kg				96.87	90-113	L608374-02	WG625553	
Arsenic	mg/kg	46.1	3.20	50	85.8	75-125	L608512-01	WG625747	
Barium	mg/kg	2040	1900	50	200.	75-125	L608512-01	WG625747	
Chromium	mg/kg	74.6	32.0	50	85.2	75-125	L608512-01	WG625747	
Lead	mg/kg	59.2	26.0	50	66.4	75-125	L608512-01	WG625747	
Selenium	mg/kg	38.3	1.70	80	73.2	75-125	L608512-01	WG625747	
Silver	mg/kg	42.6	2.40	50	80.4	75-125	L608512-01	WG625747	
Cadmium	mg/kg	44.2	0	10	88.4	75-125	L608512-01	WG625747	

Analyte	Units	Matrix Spike Duplicate				Limit	RPD	Limit	Ref Samp	Batch
		MSD	Ref	1Rec	1Rec					
Mercury	mg/kg	0.702	0.293	130.	60-120	82.3	20	L608349-07	WG625597	

* Performance of this Analyte is outside of established criteria.
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Henry Gompert
818 S. Beltline Hwy E
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Quality Assurance Report
Level II

L608340

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Fax: (615) 758-5859

Tax I.D. 62-0814289

Est. 1970

December 06, 2012

Analyte	Units	MSD	Matrix Spike Duplicate			Limit	APD	Limit Ref Samp	Batch
			Ref	Rec					
1,1,1,2-Tetrachloroethane	mg/kg	0.105	0.116	84.0	49-135	10.4	23	L608374-02	WG625553
1,1,1-Trichloroethane	mg/kg	0.115	0.127	91.8	43-142	10.5	24	L608374-02	WG625553
1,1,2,2-Tetrachloroethane	mg/kg	0.107	0.119	85.6	42-147	10.7	25	L608374-02	WG625553
1,1,2-Trichloroethane	mg/kg	0.101	0.118	81.1	51-134	14.9	21	L608374-02	WG625553
1,1,2-Trichlorotrifluoroethane	mg/kg	0.107	0.123	85.4	25-156	13.9	29	L608374-02	WG625553
1,1-Dichloroethane	mg/kg	0.113	0.124	90.7	50-131	8.97	21	L608374-02	WG625553
1,1-Dichloroethene	mg/kg	0.116	0.129	92.5	29-145	10.3	28	L608374-02	WG625553
1,1-Dichloropropene	mg/kg	0.0989	0.112	79.1	40-136	12.6	24	L608374-02	WG625553
1,2,3-Trichlorobenzene	mg/kg	0.0443	0.0478	35.4	13-142	7.77	33	L608374-02	WG625553
1,2,3-Trichloropropane	mg/kg	0.104	0.117	83.2	41-149	11.5	26	L608374-02	WG625553
1,2,3-Trimethylbenzene	mg/kg	0.0741	0.0835	58.9	33-146	12.0	27	L608374-02	WG625553
1,2,4-Trichlorobenzene	mg/kg	0.0435	0.0472	34.8	12-140	8.07	32	L608374-02	WG625553
1,2,4-Tripentylbenzene	mg/kg	0.0741	0.0867	59.3	29-143	15.7	30	L608374-02	WG625553
1,3-Dibromo-3-Chloropropane	mg/kg	0.103	0.109	82.5	29-151	5.97	31	L608374-02	WG625553
1,2-Dibromoethane	mg/kg	0.0962	0.109	77.0	48-133	12.9	22	L608374-02	WG625553
1,2-Dichlorobenzene	mg/kg	0.0709	0.0764	56.7	37-136	7.51	25	L608374-02	WG625553
1,2-Dichloroethane	mg/kg	0.0981	0.108	78.5	49-131	9.61	20	L608374-02	WG625553
1,2-Dichloropropane	mg/kg	0.107	0.116	83.2	50-132	8.59	21	L608374-02	WG625553
1,3,5-Trimethylbenzene	mg/kg	0.0715	0.0850	57.2	29-144	17.2	30	L608374-02	WG625553
1,3-Dichlorobenzene	mg/kg	0.0670	0.0759	53.6	26-140	12.4	28	L608374-02	WG625553
1,3-Dichloropropane	mg/kg	0.0971	0.109	77.7	50-126	11.4	22	L608374-02	WG625553
1,4-Dichlorobenzene	mg/kg	0.0643	0.0716	51.5	34-132	10.7	26	L608374-02	WG625553
2,2-Dichloropropane	mg/kg	0.126	0.139	100.	35-148	10.4	26	L608374-02	WG625553
2-Butanone (MEK)	mg/kg	0.590	0.622	94.4	40-149	5.20	27	L608374-02	WG625553
2-Chloroethyl vinyl ether	mg/kg	0.500	0.563	80.0	10-133	11.8	33	L608374-02	WG625553
2-Chlorotoluene	mg/kg	0.0741	0.0852	59.3	34-136	13.9	28	L608374-02	WG625553
4-Chlorotoluene	mg/kg	0.0725	0.0837	58.0	31-137	14.3	27	L608374-02	WG625553
4-Methyl-2-pentanone (MIBK)	mg/kg	0.560	0.603	89.6	37-153	7.36	27	L608374-02	WG625553
Acetone	mg/kg	0.589	0.633	94.3	10-177	7.20	28	L608374-02	WG625553
Acrylonitrile	mg/kg	0.552	0.566	88.2	33-159	2.52	26	L608374-02	WG625553
Benzene	mg/kg	0.109	0.119	87.0	44-131	8.84	21	L608374-02	WG625553
Bromobenzene	mg/kg	0.0758	0.0888	60.6	36-132	15.8	26	L608374-02	WG625553
Bromodichloromethane	mg/kg	0.103	0.113	82.3	48-134	9.11	20	L608374-02	WG625553
Bromoform	mg/kg	0.101	0.109	80.4	34-141	8.31	24	L608374-02	WG625553
Bromomethane	mg/kg	0.131	0.139	105.	19-173	6.09	25	L608374-02	WG625553
Carbon tetrachloride	mg/kg	0.108	0.120	86.8	36-140	10.5	26	L608374-02	WG625553
Chlorobenzene	mg/kg	0.0870	0.100	69.6	42-133	14.74	24	L608374-02	WG625553
Chlorodibromomethane	mg/kg	0.101	0.114	81.1	45-135	12.0	23	L608374-02	WG625553
Chloroethane	mg/kg	0.123	0.135	98.2	16-178	9.11	25	L608374-02	WG625553
Chloroform	mg/kg	0.112	0.123	89.6	52-130	9.03	21	L608374-02	WG625553
Chloromethane	mg/kg	0.115	0.128	91.7	28-147	10.8	23	L608374-02	WG625553
cis-1,2-Dichloroethane	mg/kg	0.107	0.118	85.9	52-138	9.02	21	L608374-02	WG625553
cis-1,3-Dichloropropene	mg/kg	0.0962	0.107	77.0	46-131	10.9	21	L608374-02	WG625553
Di-isopropyl ether	mg/kg	0.413	0.423	90.2	16-134	3.50	20	L608374-02	WG625553
Dibromomethane	mg/kg	0.103	0.113	82.7	51-133	8.44	21	L608374-02	WG625553
Dichlorodifluoromethane	mg/kg	0.121	0.135	98.6	12-179	11.4	27	L608374-02	WG625553
Ethylbenzene	mg/kg	0.0887	0.105	71.0	38-139	17.0	27	L608374-02	WG625553
Hexachloro-1,3-butadiene	mg/kg	0.0202	0.0253	16.1	10-147	22.6	37	L608374-02	WG625553
Isopropylbenzene	mg/kg	0.0795	0.0936	63.6	34-137	16.2	29	L608374-02	WG625553
Methyl tert-butyl ether	mg/kg	0.120	0.128	95.8	45-134	6.59	22	L608374-02	WG625553
Methylene Chloride	mg/kg	0.107	0.117	85.3	41-133	9.54	28	L608374-02	WG625553
n-Butylbenzene	mg/kg	0.0441	0.0496	35.3	19-149	11.7	32	L608374-02	WG625553
n-Propylbenzene	mg/kg	0.0680	0.0795	54.4	27-142	15.6	29	L608374-02	WG625553
Naphthalene	mg/kg	0.0698	0.0725	55.9	19-146	3.78	30	L608374-02	WG625553
p-Isopropyltoluene	mg/kg	0.0551	0.0647	44.1	21-150	16.0	31	L608374-02	WG625553
sec-Butylbenzene	mg/kg	0.0534	0.0622	42.7	25-148	15.3	31	L608374-02	WG625553
Styrene	mg/kg	0.0867	0.100	69.4	30-156	14.4	26	L608374-02	WG625553
tert-Butylbenzene	mg/kg	0.0656	0.0755	52.3	32-146	14.0	30	L608374-02	WG625553
Tetrachloroethene	mg/kg	0.0815	0.0964	65.2	35-139	16.8	27	L608374-02	WG625553

* Performance of this Analyte is outside of established criteria.

For additional information, please see Attachment A 'List of Analytes with QC Qualifiers.'



YOUR LAB OF CHOICE

Panhandle Geotechnical & Env., Inc.
Hansy Compert
818 S. Beltline Hwy E
Scottsbluff, NE 69361

Quality Assurance Report
Level II

L608340

13065 Lebanon Rd.
Mt. Juliet, TN 37122
(615) 758-5858
1-800-767-5859
Fax (615) 758-5859

Tax I.D. 62-0814389

Est. 1970

December 06, 2012

Analyte	Units	MSD	Matrix Spike Duplicate		Limit	RPD	Limit Ref Samp	Batch
			Ref	Rec				
Toluene	mg/kg	0.0951	0.109	1.76.1	43-127	13.9	21 L608374-02	WG625553
trans-1,2-Dichloroethene	mg/kg	0.0978	0.115	78.3	41-132	16.0	23 L608374-02	WG625553
trans-1,1-Dichloropropene	mg/kg	0.0862	0.0996	68.9	43-129	14.5	23 L608374-02	WG625553
Trichloroethene	mg/kg	0.101	0.114	81.0	42-136	12.1	23 L608374-02	WG625553
Trichlorofluoromethane	mg/kg	0.122	0.136	97.6	20-178	11.1	30 L608374-02	WG625553
Vinyl chloride	mg/kg	0.116	0.127	93.0	30-157	9.10	24 L608374-02	WG625553
Xylenes, Total	mg/kg	0.270	0.314	72.0	38-137	15.0	26 L608374-02	WG625553
4-Bromofluorobenzene				98.04	67-133			WG625553
Dibromofluoromethane				99.64	72-135			WG625553
Toluene-d8				96.97	90-113			WG625553
Arsenic	mg/kg	49.1	46.1	91.8	75-125	6.30	20 L608512-01	WG625747
Barium	mg/kg	2350	2040	900.5	75-125	14.1	20 L608512-01	WG625747
Chromium	mg/kg	80.1	74.6	96.2	75-125	7.11	20 L608512-01	WG625747
Lead	mg/kg	66.6	59.2	81.2	75-125	11.8	20 L608512-01	WG625747
Selenium	mg/kg	42.7	38.3	82.0	75-125	10.9	20 L608512-01	WG625747
Silver	mg/kg	42.7	42.6	80.6	75-125	0.334	20 L608512-01	WG625747
Cadmium	mg/kg	39.7	44.2	79.4	75-125	10.7	20 L608512-01	WG625747

Post Spike

Serial Dilution

Batch number / Run number / Sample number cross reference

WG625597: R2461618: L608340-01
WG625553: R2462557: L608340-01
WG625747: R2463558: L608340-01
WG626219: R2465817: L608340-01

* Calculations are performed prior to rounding of reported values.
* Performance of this Analyte is outside of established criteria.
For additional information, please see Attachment A 'List of Analytes with QC Qualifiers.'



YOUR LAB OF CHOICE

Panhandle Geotechnical & Env., Inc.
Henry Gompert
818 S. Beltline Hwy E
Scottsbluff, NE 69361

Quality Assurance Report
Level II

L609340

12065 Lebanon Rd.
Mt. Juliet, TN 37122
(615) 758-5858
1-800-767-5859
Fax: (615) 758-5859

Tax I.D. 62-0814289

Est. 1970

December 06, 2012

The data package includes a summary of the analytic results of the quality control samples required by the SW-846 or CWA methods. The quality control samples include a method blank, a laboratory control sample, and the matrix spike/matrix spike duplicate analysis. If a target parameter is outside the method limits, every sample that is effected is flagged with the appropriate qualifier in Appendix B of the analytic report.

Method Blank - an aliquot of reagent water carried through the entire analytic process. The method blank results indicate if any possible contamination exposure during the sample handling, digestion or extraction process, and analysis. Concentrations of target analytes above the reporting limit in the method blank are qualified with the "B" qualifier.

Laboratory Control Sample - is a sample of known concentration that is carried through the digestion/extraction and analysis process. The percent recovery, expressed as a percentage of the theoretical concentration, has statistical control limits indicating that the analytic process is "in control". If a target analyte is outside the control limits for the laboratory control sample or any other control sample, the parameter is flagged with a "J4" qualifier for all effected samples.

Matrix Spike and Matrix Spike Duplicates - is two aliquots of an environmental sample that is spiked with known concentrations of target analytes. The percent recovery of the target analytes also has statistical control limits. If any recoveries that are outside the method control limits, the sample that was selected for matrix spike/matrix spike duplicate analysis is flagged with either a "J5" or a "J6". The relative percent difference (RPD) between the matrix spike and the matrix spike duplicate recoveries is all calculated. If the RPD is above the method limit, the effected samples are flagged with a "J3" qualifier.

NON-HAZARDOUS WASTE MANIFEST		WWM		1261142	
1. Generator's Mailing Address & Phone <i>Omega Capital, LLC PO Box 310 Geng N264341 (308) 436-0004</i>		Generator's Project Address <i>1390900 Lockwood Geng NE 65-341</i>		2. To: <i>Enviro Service</i>	
3. Transporter: Company Name <i>Enviro Service 13085</i>		3a. Transporter's Phone <i>(308) 632-3933</i>		2a. Account # <i>1299</i>	
4. Transporter: Company Name		4a. Transporter's Phone		5a. Facility's Phone <i>(303) 644-4335</i>	
5. Designated Management Facility Name and Site Address <i>CSI Waste Management 41300 E. 83rd Ave Denver, CO 80102</i>					
6. Waste Code/Profile #	Waste Description	Quantity	Units		
<i>113245 CO</i>	<i>oily sludge</i>	<i>2</i>	<i>Drum 55 gal</i>		
NON-FRIABLE ASBESTOS WASTE ONLY (Friable may not be shipped on this manifest)					
Waste Code/Profile #	Waste Description	Quantity	Units or Drums		
	Non-Friable Asbestos				
7. Regulatory Agency: Colorado Department of Public Health and Environment 4300 Cherry Creek Drive South Denver, CO 80246		24 HOUR EMERGENCY PHONE NUMBER <i>(877) 269-7949</i>			
8. Contractor/Generator Certification: I hereby certify that the above described waste is not hazardous waste as defined by federal, state or local regulations and does not contain regulated quantities of PCB's or radioactive materials. This waste has been accurately classified, described, packaged, marked and labeled and is in proper condition for transportation according to applicable international and governmental regulations.					
9. Transporter 1 Acknowledgement of Receipt of Materials					
Printed/Typed Full Name <i>MARGARET AIN</i>		Signature (Full Name) <i>Margaret A. In</i>		Month Day Year <i>6/6/13</i>	
10. Transporter 2 Acknowledgement of Receipt of Materials					
Printed/Typed Full Name <i>PAUL SCISS</i>		Signature (Full Name) <i>Paul Sciss</i>		Month Day Year <i>6/6/13</i>	
11. Discrepancy Indication Space <i>Chg in qty made by driver - overrated - Rmvd to compex</i>					
Initials of Person noting discrepancy <i>JA</i>		Date <i>6/25/13</i>		12. Ticket # <i>1060038</i>	
13. Management Method/Location <input checked="" type="checkbox"/> Solidification <input type="checkbox"/> Monofill <input type="checkbox"/> Landfill <input type="checkbox"/> Bio-Beds					
Grid Location (if applicable): <i>EW5318' 139° 51.060 W 104° 30.140</i>					
14. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in item 11.					
Printed/Typed Full Name <i>Joyce Newman</i>		Signature (Full Name) <i>Joyce Newman</i>		Month Day Year <i>6/6/13</i>	
ORIGINAL - RETURN TO GENERATOR					

OMEGA ENV000032

NON-HAZARDOUS WASTE MANIFEST		WM 229,553		1241228	
1. Generator's Mailing Address & Phone Omega Capital LLC 1390900 Lookout Rd. Gering, NE 69341 (303) 436-0004			Generator's Project Address		
2. Bill to: Enviro Service			2a. Account # 1249.		
3. Transporter: Company Name Enviro Service 13074			3a. Transporter's Phone (308) 632-3933		
4. Transporter: Company Name			4a. Transporter's Phone		
5. Designated Management Facility Name and Site Address Conservation Services 41800 E. 88th Ave. Bennett, CO 80102			5a. Facility's Phone (303) 644-4335		
6. Waste Code/Profile #	Waste Description	Quantity	Units		
11324500	oil sludge	3	55 gal		
NON-FRIABLE ASBESTOS WASTE ONLY (Friable may not be shipped on this manifest)					
Waste Code/Profile #	Waste Description	Quantity	Units or Drums		
	Non-Friable Asbestos		15		
7. Regulatory Agency: Colorado Department of Public Health and Environment 4300 Cherry Creek Drive South Denver, CO 80246		24 HOUR EMERGENCY PHONE NUMBER (877) 262-7549			
8. Contractor/Generator Certification: I hereby certify that the above described waste is not hazardous waste as defined by federal, state or local regulations and does not contain regulated quantities of PCB's or radioactive materials. This waste has been accurately classified, described, packaged, marked and labeled and is in proper condition for transportation according to applicable international and governmental regulations.					
8a. Contractor/Generator					
Printed/Typed Full Name X MARGARET A. W.		Signature (Full Name) X Margaret A. W.		Month Day Year 15 18 13	
9. Transporter 1 Acknowledgement of Receipt of Materials					
Printed/Typed Full Name Bryce Fossard		Signature (Full Name) Bryce Fossard		Month Day Year 10 20 13	
10. Transporter 2 Acknowledgement of Receipt of Materials					
Printed/Typed Full Name		Signature (Full Name)		Month Day Year	
11. Discrepancy Indication Space				12. Ticket # 104773	
Initials of Person noting discrepancy _____ Date _____					
13. Management Method/Location <input checked="" type="checkbox"/> Solidification <input type="checkbox"/> Monofill <input type="checkbox"/> Landfill <input type="checkbox"/> Bio-Beds					
Grid Location (if applicable): 405318' N 99° 51.060 W 104° 30.145					
14. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in item 11.					
Printed/Typed Full Name Joyce Newman		Signature (Full Name) Joyce Newman		Month Day Year 11 10 13	

ORIGINAL - RETURN TO GENERATOR

OMEGA ENV000033

NON-HAZARDOUS WASTE MANIFEST		WM WASTE MANIFEST		1261142	
1. Generator's Mailing Address & Phone Omega Capital, LLC. PO Box 310 Greeley NE 68403 (308) 436-0004		Generator's Project Address 1390900 Leeward Greeley NE 68403		4. Bill to: Enviro Service 2a. Account # 1299	
3. Transporter: Company Name Enviro Service Inc		3a. Transporter's Phone (308) 632-3133		4a. Transporter's Phone	
5. Designated Management Facility Name and Site Address CSI Waste Management 41500 E. 58th Ave Bennett, CO. 80102		5a. Facility's Phone (303) 644-4335			
6. Waste Code/Profile # 11324500	Waste Description oily sludge	Quantity 2	Units Drum 55 gal		
NON-FRIABLE ASBESTOS WASTE ONLY (Friable may not be shipped on this manifest)					
Waste Code/Profile #	Waste Description	Quantity	Units or Drums		
Non-Friable Asbestos					
7. Regulatory Agency: Colorado Department of Public Health and Environment 4300 Cherry Creek Drive South Denver, CO 80246		24 HOUR EMERGENCY PHONE NUMBER (877) 269-7949			
8. Contractor/Generator Certification: I hereby certify that the above described waste is not hazardous waste as defined by federal, state or local regulations and does not contain regulated quantities of PCB's or radioactive materials. This waste has been accurately classified, described, packaged, marked and labeled and is in proper condition for transportation according to applicable international and governmental regulations.					
9a. Contractor/Generator Printed/Typed Full Name: MARGARET AIN Signature (Full Name): Margaret A. In Month Day Year: 6/6/13					
9. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Full Name: PAUL SOSS Signature (Full Name): Paul Soss Month Day Year: 6/6/13					
10. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Full Name: _____ Signature (Full Name): _____ Month Day Year: ____/____/____					
11. Discrepancy Indication Space Chg in qty made by driver - overfilled Rmvd to Compex Initials of Person noting discrepancy: J Date: 6/25/13					12. Ticket # 106038
13. Management Method/Location <input checked="" type="checkbox"/> Solidification <input type="checkbox"/> Monofill <input type="checkbox"/> Landfill <input type="checkbox"/> Bio-Beds Grid Location (if applicable): EWS318' N39° 51.060 W104° 30.146					
14. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in item 11. Printed/Typed Full Name: Joyce Newman Signature (Full Name): Joyce Newman Month Day Year: 6/25/13					

ORIGINAL - RETURN TO GENERATOR

OMEGA ENV000034

NON-HAZARDOUS WASTE MANIFEST		WM 1261142		1261154	
GENERATOR	1. Generator's Mailing Address & Phone Omega Capital, LLC. P.O. Box 310 Orting, NE 68341 (308) 436-0004		Generator's Project Address 1390900 Leckwood Rd. Gering, NE 69341		2. Bill to: Enviro Service
			3. Transporter's Company Name Enviro Service 13095		2a. Account # 1299
			4. Transporter's Company Name		3a. Transporter's Phone (308) 632-3933
			5. Designated Management Facility Name and Site Address Waste Management 41800 E. 88th Ave. Bennett, CO. 80102		4a. Transporter's Phone
					5a. Facility's Phone (303) 644-4335
TRANSPORTER	6. Waste Code/Profile #	Waste Description	Quantity	Units	
	11324500	oily sludge.	1	DM 55-gal	
	NON-FRIABLE ASBESTOS WASTE ONLY (Friable may not be shipped on this manifest)				
	Waste Code/Profile #	Waste Description	Quantity	Units or Drums	
	Non-Friable Asbestos				
FACILITY	7. Regulatory Agency: Colorado Department of Public Health and Environment 4300 Cherry Creek Drive South Denver, CO 80246		24 HOUR EMERGENCY PHONE NUMBER (877) 269-7949		
	8. Contractor/Generator Certification: I hereby certify that the above described waste is not hazardous waste as defined by federal, state or local regulations and does not contain regulated quantities of PCB's or radioactive materials. This waste has been accurately classified, described, packaged, marked and labeled and is in proper condition for transportation according to applicable international and governmental regulations.				
	9. Transporter 1 Acknowledgement of Receipt of Materials				
	Printed/Typed Full Name		Signature (Full Name)		Month Day Year
	See 1261142 - Attached				
FACILITY	10. Transporter 2 Acknowledgement of Receipt of Materials		12. Ticket #		
	Printed/Typed Full Name		Signature (Full Name)		Month Day Year
	Markin Howard		Markin Howard		1-71-2113
	11. Discrepancy Indication Space		Initials of Person noting discrepancy _____ Date _____		
			106351		
13. Management Method/Location <input checked="" type="checkbox"/> Solidification <input type="checkbox"/> Monofill <input type="checkbox"/> Landfill <input type="checkbox"/> Bio-Beds					
Grid Location (if applicable) QW5318 139° 51.000 N 104° 30.140 W					
14. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in item 11.					
Printed/Typed Full Name		Signature (Full Name)		Month Day Year	
Joyce Newman		Joyce Newman		107103K3	

ORIGINAL - RETURN TO GENERATOR

OMEGA ENV000035

NON-HAZARDOUS WASTE MANIFEST		WM 229,125		1262318	
1. Generator's Mailing Address & Phone Omega Capital, LLC 1390200 Lockwood Road Gering, NE 69341 (308) 436-0044		Generator's Project Address		2. Bill to: Enviro Service	
				2a. Account # 1299	
3. Transporter: Company Name Enviro Service 12184		3a. Transporter's Phone (308) 632-3933		4b. Transporter's Phone	
4. Transporter: Company Name		5. Designated Management Facility Name and Site Address Conservation Services 41800 E. 88th Ave. Bennett, CO 80102		5a. Facility's Phone (303) 644-4335	
6. Waste Code/Profile # 1132450	Waste Description Oily Sludge	Quantity 10	Units DM		
NON-FRIABLE ASBESTOS WASTE ONLY (Friable may not be shipped on this manifest)					
Waste Code/Profile #	Waste Description	Quantity	Units or Drums		
	Non-Friable Asbestos				
7. Regulatory Agency: Colorado Department of Public Health and Environment 4300 Cherry Creek Drive South Denver, CO 80246		24 HOUR EMERGENCY PHONE NUMBER (877) 269-7449			
8. Contractor/Generator Certification: I hereby certify that the above described waste is not hazardous waste as defined by federal, state or local regulations and does not contain regulated quantities of PCB's or radioactive materials. This waste has been accurately classified, described, packaged, marked and labeled and is in proper condition for transportation according to applicable international and governmental regulations.					
8a. Contractor/Generator Printed/Typed Full Name MARGARET AIN		Signature (Full Name) <i>Margaret AIN</i>		Month Day Year 12 20 12	
9. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Full Name PAUL COSS		Signature (Full Name) <i>Paul Coss</i>		Month Day Year 12 20 12	
10. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Full Name		Signature (Full Name)		Month Day Year	
11. Discrepancy Indication Space Initials of Person noting discrepancy _____ Date _____				12. Ticket # 101006	
13. Management Method/Location <input checked="" type="checkbox"/> Solidification <input type="checkbox"/> Monofill <input type="checkbox"/> Landfill <input type="checkbox"/> Bio-Beds Grid Location (if applicable): E11 5244' N 39° 51.116 W 104° 30.153					
14. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 11. Printed/Typed Full Name Joyce Newman					
Signature (Full Name) <i>Joyce Newman</i>		Month Day Year 12/10/15			

ORIGINAL - RETURN TO GENERATOR

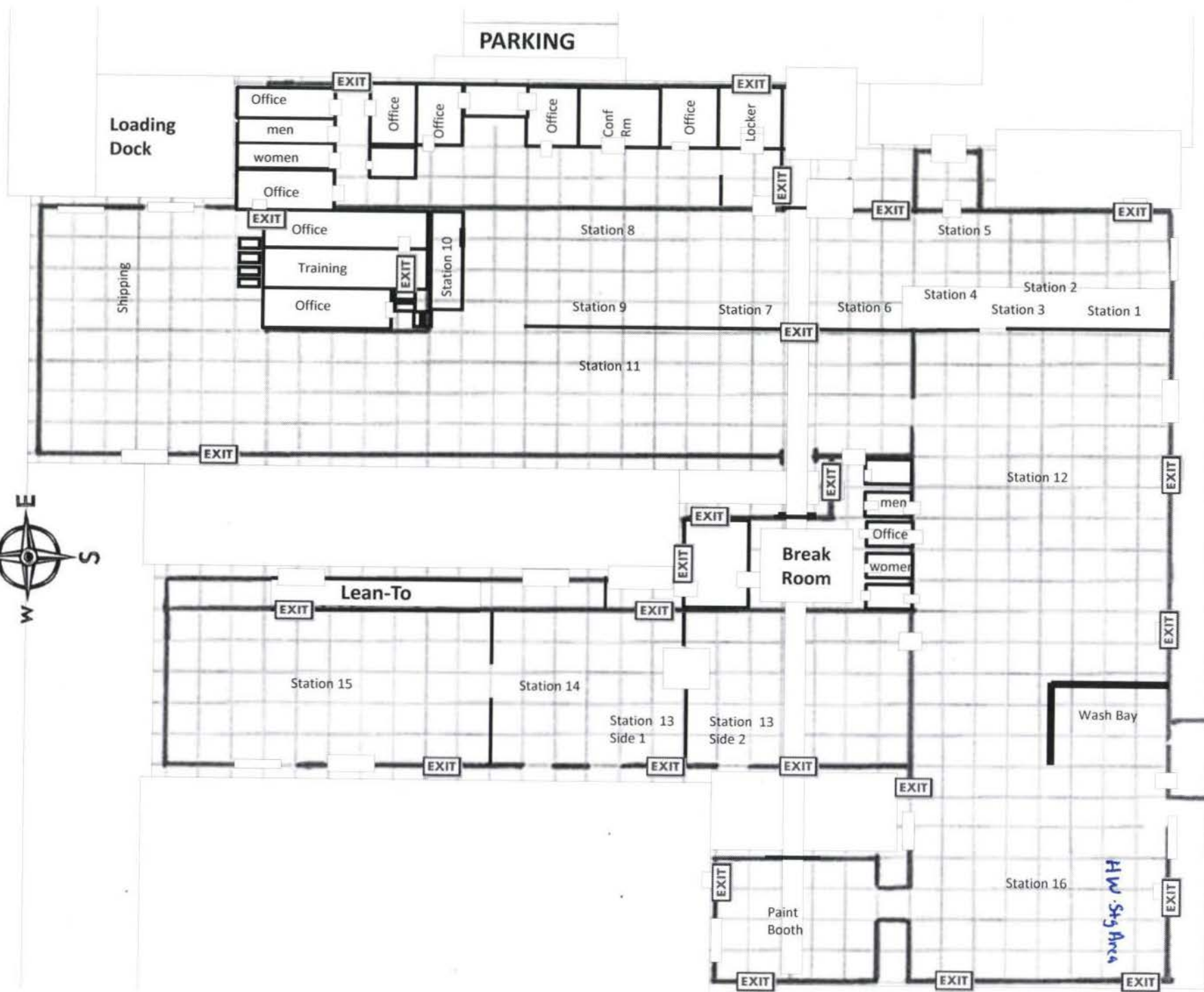
OMEGA ENV000036



Omega Capital
Gering, NE

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PA01861

Omega Capital, LLC

P.O. Box 310, 130900 Lockwood Rd.
 Gering, NE 69341
 Phone: 308-436-0004
 Fax: 308-436-0001

Material Requisition

N2 50020

Date: 11.12.13

Shop Location: MAINTENANCE Requisitioned By: _____

Description: HAVE SAFETY-KLEEN PICK-UP AND DISPOSE OF SLUDGE WASTE

Purpose: _____

Part Number: _____ Serial Number: _____

Quantity on Hand: _____ Quantity Requested: 11/55042 Date Needed: _____

Mill Cert. Requested: ☐ Yes ☐ No MSDS Requested: ☐ Yes ☐ No

Manager Approval: OK BY 11-13-13

Purchasing Department

PROFESSIONAL SERVICES

Approved Vendor: SAFETY Kleen Accounting Code: 700000

Contact Person: _____ Confirmation Number: _____

Customer Billed To: _____

Inventory Part Number: _____ Cost Per Item: _____ Total Cost: \$3,817.91

Mill Cert. Requested: ☐ Yes ☐ No MSDS Requested: ☐ Yes ☐ No

Date Ordered: _____ Estimated Date of Arrival: _____

FOB: _____ COD: _____ Payment Terms: _____

Receiving Department

Date Received: 11-14-13 Quantity Received: Services Rendered

Mill Cert. Received: ☐ Yes ☒ No MSDS Requested: ☐ Yes ☒ No Lot Number: _____BOL Attached / Correct: ☒ Yes ☐ No Packing List Attached / Correct: ☒ Yes ☐ No

Quantity Sampled: N/A Inspected By: [Signature]

Remarks / Observations: _____

Material Acceptable for Release? ☒ Yes ☐ No

Received By: [Signature] Date: 11-14-13

White - Purchasing

Green - Accounting

Canary - Receiving

Pink - Partial Order Received

Goldenrod - Shop Copy

Form No: PM-01B

Issued: 1-23-13

Revision N/A

OMEGA 001-01/13

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number CES06	2. Page 1 of 2	3. Emergency Response Phone 1-800-468-1760	4. Manifest Tracking Number 003186664 SKS	
5. Generator's Name and Mailing Address OMEGA CAPITAL 130900 LOCKWOOD RD GERING NE 69341-5212			Generator's Site Address (if different than mailing address)			
Generator's Phone: 308-436-0004						
6. Transporter 1 Company Name SAFETY-KLEEN SYSTEMS, INC.			U.S. EPA ID Number TXR000081205			
7. Transporter 2 Company Name Clean Harbors Env Services			U.S. EPA ID Number MDAD039322250			
8. Designated Facility Name and Site Address CLEAN HARBORS DEER TRAIL LLC 108555 E HIGHWAY 36 DEER TRAIL, CO 80105 970-386-2262			U.S. EPA ID Number COD991300484			
Facility's Phone:						
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit WL/Vol.
	X	1. UN3082, WASTE ENVIRONMENTALLY HAZARDOUS SUBSTANCES, LIQUID, N.O.S., (LEAD), 9, PG III	11 DM		4950	P
		2.				
		3.				
		4.				
13. Waste Codes 0008						
14. Special Handling Instructions and Additional Information TSD:116591 62238025 10179834 24 HR EMERGENCY #1-800-468-1760 (SAFETY-KLEEN) SK AUTHORIZED TO RETAIN LICENSED SUBSEQUENT CARRIERS AS NECESSARY 23 10851D						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Offeror's Printed/Typed Name STEPHEN M. WILSON			Signature [Signature]		Month Day Year 11 13 13	
INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Transporter signature (for exports only): _____ Date leaving U.S.: _____					
	17. Transporter Acknowledgment of Receipt of Materials					
TRANSPORTER	Transporter 1 Printed/Typed Name Fred Gomez			Signature [Signature]		Month Day Year 11 13 13
	Transporter 2 Printed/Typed Name Stephanie Sharp			Signature [Signature]		Month Day Year 11 20 13
DESIGNATED FACILITY	18. Discrepancy					
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
	Manifest Reference Number: _____					
	18b. Alternate Facility (or Generator) U.S. EPA ID Number _____					
	Facility's Phone: _____					
18c. Signature of Alternate Facility (or Generator) _____ Month Day Year _____						
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1. H132		2.		3.		4.
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a						
Printed/Typed Name Katie Musgrave			Signature [Signature]		Month Day Year 11 12 13	

GENERATOR



P.O. Box 386
Jones, Oklahoma 73049-0386
Telephone (405) 399-2201
Facsimile (405) 399-2401

**CERTIFICATE OF RECEIPT / PROCESSING / DESTRUCTION
OF
SPENT LEAD ACID BATTERIES**

DATE:	02/01/2013
RECEIVED FROM:	BT Metals
ADDRESS:	1855 3 rd St., PO Box 2 Gering, NE 69341
TYPE OF BATTERIES:	Scrap Lead Acid Batteries
RECEIPT DATE:	02/01/2013
NET WEIGHT RECEIVED FOR RECYCLING PURPOSES:	Approx. 37,386 lbs Industrial scrap 9,014 lbs Auto

THIS IS TO CERTIFY THAT THE MATERIAL RECEIVED AT OUR FACILITY IN JONES, OKLAHOMA IS SCRAPPED IN ACCORDANCE WITH EXISTING UNITED STATES ENVIRONMENTAL PROTECTION AGENCY AND OKLAHOMA STATE DEPARTMENT OF ENVIRONMENTAL QUALITY SOLID WASTE DIVISION REGULATIONS, **E.P.A. NUMBER OKD032963530**.

THIS IS TO FURTHER CERTIFY THAT THIS MATERIAL WAS PURCHASED AND WILL BE USED FOR RECYCLING PURPOSES ONLY.

MADEWELL & MADEWELL, INC.

Cathy Hinson

COMPANY REPRESENTATIVE



P.O. Box 386
Jones, Oklahoma 73049-0386
Telephone (405) 399-2201
Facsimile (405) 399-2401

**CERTIFICATE OF RECEIPT / PROCESSING / DESTRUCTION
OF
SPENT LEAD ACID BATTERIES**

DATE:	02/26/2013
RECEIVED FROM:	BT Metals
ADDRESS:	1855 3 rd St., PO Box 2 Gering, NE 69341
TYPE OF BATTERIES:	Scrap Lead Acid Batteries
RECEIPT DATE:	02/26/2013
NET WEIGHT RECEIVED FOR RECYCLING PURPOSES:	Approx. 29,265 lbs Industrial scrap 16,570 lbs Auto

THIS IS TO CERTIFY THAT THE MATERIAL RECEIVED AT OUR FACILITY IN JONES, OKLAHOMA IS SCRAPPED IN ACCORDANCE WITH EXISITNG UNITED STATES ENVIRONMENTAL PROTECTION AGENCY AND OKLAHOMA STATE DEPARTMENT OF ENVIROMENTAL QUALITY SOLID WASTE DIVISION REGULATIONS, **E.P.A. NUMBER OKD032963530.**

THIS IS TO FURTHER CERTIFY THAT THIS MATERIAL WAS PURCHASED AND WILL BE USED FOR RECYCLING PURPOSES ONLY.

MADEWELL & MADEWELL, INC.

Cathy Hinson

COMPANY REPRESENTATIVE

B & T Metals
Profit Statement
28-Feb

Load: Batteries (Auto/Ind)
Trailer No.: Madewell Freight
Date Shipped: 28-Feb

Metal Grade	Net Weight	Price Bought	Total	Price Sold	Total
Auto Batteries	16570.0	\$ 0.20	\$ 3,314.00	\$ 0.38	\$ 6,296.60
Industrial Batteries	29265.0	\$ 0.27	\$ 7,901.55	\$ 0.36	\$ 10,535.40
TOTAL:	45835.0		\$ 11,215.55		\$ 16,832.00

Total Sold	\$ 16,832.00
Total Bought	\$ 11,215.55
Net Profit	\$ 5,616.45



P.O. Box 386
Jones, Oklahoma 73049-0386
Telephone (405) 399-2201
Facsimile (405) 399-2401

**CERTIFICATE OF RECEIPT / PROCESSING / DESTRUCTION
OF
SPENT LEAD ACID BATTERIES**

DATE:	03/21/2013
RECEIVED FROM:	BT Metals
ADDRESS:	1855 3 rd St., PO Box 2 Gering, NE 69341
TYPE OF BATTERIES:	Scrap Lead Acid Batteries
RECEIPT DATE:	03/21/2013
NET WEIGHT RECEIVED FOR RECYCLING PURPOSES:	Approx. 45,640 lbs

THIS IS TO CERTIFY THAT THE MATERIAL RECEIVED AT OUR FACILITY IN JONES, OKLAHOMA IS SCRAPPED IN ACCORDANCE WITH EXISTING UNITED STATES ENVIRONMENTAL PROTECTION AGENCY AND OKLAHOMA STATE DEPARTMENT OF ENVIRONMENTAL QUALITY SOLID WASTE DIVISION REGULATIONS, **E.P.A. NUMBER OKD032963530.**

THIS IS TO FURTHER CERTIFY THAT THIS MATERIAL WAS PURCHASED AND WILL BE USED FOR RECYCLING PURPOSES ONLY.

MADEWELL & MADEWELL, INC.

Cathy Hinson

COMPANY REPRESENTATIVE

B & T Metals
Profit Statement
22-Mar

Load: Batteries (Industrial)
Trailer No.: Madewell Freight
Date Shipped: 22-Mar

Metal Grade	Net Weight	Price Bought	Total	Price Sold	Total
Industrial Batteries	45565.0	\$ 0.27	\$ 12,302.55	\$ 0.36	\$ 16,403.40

Amount Bought	\$ 16,403.40
Amount Sold	\$ 12,302.55
Net Profit	\$ 4,100.85



P.O. Box 386
Jones, Oklahoma 73049-0386
Telephone (405) 399-2201
Facsimile (405) 399-2401

**CERTIFICATE OF RECEIPT / PROCESSING / DESTRUCTION
OF
SPENT LEAD ACID BATTERIES**

DATE:	04/09/2013
RECEIVED FROM:	BT Metals
ADDRESS:	1855 3 rd St., PO Box 2 Gering, NE 69341
TYPE OF BATTERIES:	Scrap Lead Acid Batteries
RECEIPT DATE:	04/09/2013
NET WEIGHT RECEIVED FOR RECYCLING PURPOSES:	Approx. 33,737 lbs Ind. 12,743 lbs Auto

THIS IS TO CERTIFY THAT THE MATERIAL RECEIVED AT OUR FACILITY IN JONES, OKLAHOMA IS SCRAPPED IN ACCORDANCE WITH EXISITNG UNITED STATES ENVIRONMENTAL PROTECTION AGENCY AND OKLAHOMA STATE DEPARTMENT OF ENVIROMENTAL QUALITY SOLID WASTE DIVISION REGULATIONS, **E.P.A. NUMBER OKD032963530.**

THIS IS TO FURTHER CERTIFY THAT THIS MATERIAL WAS PURCHASED AND WILL BE USED FOR RECYCLING PURPOSES ONLY.

MADEWELL & MADEWELL, INC.

Cathy Hinson

COMPANY REPRESENTATIVE

B & T Metals
 Profit Statement
 11-Apr

Load: Batteries
 Trailer No.: MM
 Date Shipped: 11-Apr

Metal Grade	Net Weight	Price Bought	Price Bought		Price Sold	Price Sold	
			Total			Total	
Industrial Batteries	33737.00	\$ 0.27	\$ 9,108.99	\$	0.36	\$ 12,145.32	
Auto Batteries	12743.00	\$ 0.20	\$ 2,548.60	\$	0.38	\$ 4,842.34	
TOTALS:	46480.00		\$ 11,657.59			\$ 16,987.66	

Price Sold Total:	\$ 16,987.66
Price Bought Total:	\$ 11,657.59
Net Profit:	\$ 5,330.07



P.O. Box 386
Jones, Oklahoma 73049-0386
Telephone (405) 399-2201
Facsimile (405) 399-2401

**CERTIFICATE OF RECEIPT / PROCESSING / DESTRUCTION
OF
SPENT LEAD ACID BATTERIES**

DATE:	05/07/2013
RECEIVED FROM:	BT Metals
ADDRESS:	1855 3 rd St., PO Box 2 Gering, NE 69341
TYPE OF BATTERIES:	Scrap Lead Acid Batteries
RECEIPT DATE:	05/07/2013
NET WEIGHT RECEIVED FOR RECYCLING PURPOSES:	Approx. 27,126 lbs Ind. 17,620 lbs Auto

THIS IS TO CERTIFY THAT THE MATERIAL RECEIVED AT OUR FACILITY IN JONES, OKLAHOMA IS SCRAPPED IN ACCORDANCE WITH EXISTING UNITED STATES ENVIRONMENTAL PROTECTION AGENCY AND OKLAHOMA STATE DEPARTMENT OF ENVIRONMENTAL QUALITY SOLID WASTE DIVISION REGULATIONS, **E.P.A. NUMBER OKD032963530**.

THIS IS TO FURTHER CERTIFY THAT THIS MATERIAL WAS PURCHASED AND WILL BE USED FOR RECYCLING PURPOSES ONLY.

MADEWELL & MADEWELL, INC.

Cathy Hinson

COMPANY REPRESENTATIVE

B & T Metals
Profit Statement
9-May

Load: Batteries
Trailer No.: MM
Date Shipped: 9-May

Metal Grade	Net Weight	Price Bought	Price Bought		Price Sold	Price Sold	
			Total			Total	
Industrial Batteries	27048.00	\$ 0.27	\$ 7,302.96	\$	0.36	\$ 9,737.28	
Auto Batteries	17700.00	\$ 0.20	\$ 3,540.00	\$	0.37	\$ 6,549.00	
TOTALS:	44748.00		\$ 10,842.96			\$ 16,286.28	

Gross Weight: 45348.00
Tare Weight: 600.00
Net Weight: 44748.00

Price Sold Total:	\$ 16,286.28
Price Bought Total:	\$ 10,842.96
Net Profit:	\$ 5,443.32



P.O. Box 386
Jones, Oklahoma 73049-0386
Telephone (405) 399-2201
Facsimile (405) 399-2401

**CERTIFICATE OF RECEIPT / PROCESSING / DESTRUCTION
OF
SPENT LEAD ACID BATTERIES**

DATE:	05/29/2013
RECEIVED FROM:	BT Metals
ADDRESS:	1855 3 rd St., PO Box 2 Gering, NE 69341
TYPE OF BATTERIES:	Scrap Lead Acid Batteries
RECEIPT DATE:	05/29/2013
NET WEIGHT RECEIVED FOR RECYCLING PURPOSES:	Approx. 34,157 lbs Ind. 11,623 lbs Auto

THIS IS TO CERTIFY THAT THE MATERIAL RECEIVED AT OUR FACILITY IN JONES, OKLAHOMA IS SCRAPPED IN ACCORDANCE WITH EXISITNG UNITED STATES ENVIRONMENTAL PROTECTION AGENCY AND OKLAHOMA STATE DEPARTMENT OF ENVIROMENTAL QUALITY SOLID WASTE DIVISION REGULATIONS, **E.P.A. NUMBER OKD032963530.**

THIS IS TO FURTHER CERTIFY THAT THIS MATERIAL WAS PURCHASED AND WILL BE USED FOR RECYCLING PURPOSES ONLY.

MADEWELL & MADEWELL, INC.

Cathy Hinson

COMPANY REPRESENTATIVE

B & T Metals
 Profit Statement
 9-May

Load: Batteries
 Trailer No.: MM
 Date Shipped: 31-May

Metal Grade	Net Weight	Price Bought	Price Bought		Price Sold	Price Sold	
			Total			Total	
Industrial Batteries	34157.00	\$ 0.24	\$ 8,197.68	\$	0.36	\$ 12,296.52	
Auto Batteries	11623.00	\$ 0.20	\$ 2,324.60	\$	0.38	\$ 4,416.74	
TOTALS:	45780.00		\$ 10,522.28			\$ 16,713.26	

Gross Weight:	46420.00
Tare Weight:	640.00
Net Weight:	45780.00

Price Sold Total:	\$ 16,713.26
Price Bought Total:	\$ 10,522.28
Net Profit:	\$ 6,190.98



P.O. Box 386
Jones, Oklahoma 73049-0386
Telephone (405) 399-2201
Facsimile (405) 399-2401

**CERTIFICATE OF RECEIPT / PROCESSING / DESTRUCTION
OF
SPENT LEAD ACID BATTERIES**

DATE:	07/27/2013
RECEIVED FROM:	BT Metals
ADDRESS:	1855 3 rd St., PO Box 2 Gering, NE 69341
TYPE OF BATTERIES:	Scrap Lead Acid Batteries
RECEIPT DATE:	07/27/2013
NET WEIGHT RECEIVED FOR RECYCLING PURPOSES:	Approx. 19,793 lbs Ind. 25,687 lbs Auto

THIS IS TO CERTIFY THAT THE MATERIAL RECEIVED AT OUR FACILITY IN JONES, OKLAHOMA IS SCRAPPED IN ACCORDANCE WITH EXISTING UNITED STATES ENVIRONMENTAL PROTECTION AGENCY AND OKLAHOMA STATE DEPARTMENT OF ENVIRONMENTAL QUALITY SOLID WASTE DIVISION REGULATIONS, **E.P.A. NUMBER OKD032963530**.

THIS IS TO FURTHER CERTIFY THAT THIS MATERIAL WAS PURCHASED AND WILL BE USED FOR RECYCLING PURPOSES ONLY.

MADEWELL & MADEWELL, INC.

Cathy Hinson

COMPANY REPRESENTATIVE

B & T Metals
 Profit Statement
 18-Jul

Load: Batteries
 Trailer No.: MM
 Date Shipped: 30-Jul

Metal Grade	Net Weight	Price Bought	Price Bought		Price Sold	Price Sold	
			Total			Total	
Auto Batteries	25687.00	\$ 0.20	\$ 5,137.40	\$	0.38	\$ 9,761.06	
Industrial Batteries	19793.00	\$ 0.27	\$ 5,344.11	\$	0.36	\$ 7,125.48	
TOTALS:	45480.00		\$ 10,481.51			\$ 16,886.54	

Price Sold	\$ 16,866.54
Price Bought	\$ 10,481.51
Net Profit	\$ 6,385.03



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Jones, Oklahoma 73049-0386
Telephone (405) 399-2201
Facsimile (405) 399-2401

**CERTIFICATE OF RECEIPT / PROCESSING / DESTRUCTION
OF
SPENT LEAD ACID BATTERIES**

DATE:	09/28/2013
RECEIVED FROM:	BT Metals
ADDRESS:	1855 3 rd St., PO Box 2 Gering, NE 69341
TYPE OF BATTERIES:	Scrap Lead Acid Batteries
RECEIPT DATE:	09/28/2013
NET WEIGHT RECEIVED FOR RECYCLING PURPOSES:	Approx. 44,520 lbs Scrap

THIS IS TO CERTIFY THAT THE MATERIAL RECEIVED AT OUR FACILITY IN JONES, OKLAHOMA IS SCRAPPED IN ACCORDANCE WITH EXISTING UNITED STATES ENVIRONMENTAL PROTECTION AGENCY AND OKLAHOMA STATE DEPARTMENT OF ENVIRONMENTAL QUALITY SOLID WASTE DIVISION REGULATIONS, **E.P.A. NUMBER OKD032963530**.

THIS IS TO FURTHER CERTIFY THAT THIS MATERIAL WAS PURCHASED AND WILL BE USED FOR RECYCLING PURPOSES ONLY.

MADEWELL & MADEWELL, INC.

Cathy Hinson

COMPANY REPRESENTATIVE

B & T Metals
Profit Statement
1-Oct

Load: Ferrous
Trailer No.: IMI
Date Shipped: 1-Oct

Metal Grade	Net Weight	Price Bought	Price Bought Total	Price Sold	Price Sold Total
Industrial Batteries	44520.00	\$ 0.24	\$ 10,684.80	\$ 0.31	\$ 13,801.20

Price Sold Total	\$ 13,801.20
Price Bought Total	\$ 10,684.80
Expenses	\$ -
Net Profit	\$ 3,116.40



P.O. Box 386
Jones, Oklahoma 73049-0386
Telephone (405) 399-2201
Facsimile (405) 399-2401

**CERTIFICATE OF RECEIPT / PROCESSING / DESTRUCTION
OF
SPENT LEAD ACID BATTERIES**

DATE:	10/08/2013
RECEIVED FROM:	BT Metals
ADDRESS:	1855 3 rd St., PO Box 2 Gering, NE 69341
TYPE OF BATTERIES:	Scrap Lead Acid Batteries
RECEIPT DATE:	10/08/2013
NET WEIGHT RECEIVED FOR RECYCLING PURPOSES:	Approx. 20,708 lbs Ind. 24,952 lbs Auto

THIS IS TO CERTIFY THAT THE MATERIAL RECEIVED AT OUR FACILITY IN JONES, OKLAHOMA IS SCRAPPED IN ACCORDANCE WITH EXISTING UNITED STATES ENVIRONMENTAL PROTECTION AGENCY AND OKLAHOMA STATE DEPARTMENT OF ENVIRONMENTAL QUALITY SOLID WASTE DIVISION REGULATIONS, **E.P.A. NUMBER OKD032963530**.

THIS IS TO FURTHER CERTIFY THAT THIS MATERIAL WAS PURCHASED AND WILL BE USED FOR RECYCLING PURPOSES ONLY.

MADEWELL & MADEWELL, INC.

Cathy Hinson

COMPANY REPRESENTATIVE

B & T Metals
Profit Statement
10-Oct

Load: Industrial/Auto Batteries
Trailer No.: Madewell & Madewell
Date Shipped: 10-Oct

Metal Grade	Net Weight	Price Bought	Price Bought		Price Sold	Price Sold	
			Total			Total	
Industrial Batteries	20708.00	\$ 0.24	\$ 4,969.92	\$	0.31	\$ 6,419.48	
Auto Batteries	24952.00	\$ 0.20	\$ 4,990.40	\$	0.33	\$ 8,234.16	
TOTALS:	45660.00		\$ 9,960.32			\$ 14,653.64	

Price Sold Total	\$ 14,653.64
Price Bought Total	\$ 9,960.32
Net Profit	\$ 4,693.32



P.O. Box 386
Jones, Oklahoma 73049-0386
Telephone (405) 399-2201
Facsimile (405) 399-2401

**CERTIFICATE OF RECEIPT / PROCESSING / DESTRUCTION
OF
SPENT LEAD ACID BATTERIES**

DATE:	10/21/2013
RECEIVED FROM:	BT Metals
ADDRESS:	1855 3 rd St., PO Box 2 Gering, NE 69341
TYPE OF BATTERIES:	Scrap Lead Acid Batteries
RECEIPT DATE:	10/21/2013
NET WEIGHT RECEIVED FOR RECYCLING PURPOSES:	Approx. 32,769 lbs Ind. 13,391 lbs Auto

THIS IS TO CERTIFY THAT THE MATERIAL RECEIVED AT OUR FACILITY IN JONES, OKLAHOMA IS SCRAPPED IN ACCORDANCE WITH EXISTING UNITED STATES ENVIRONMENTAL PROTECTION AGENCY AND OKLAHOMA STATE DEPARTMENT OF ENVIRONMENTAL QUALITY SOLID WASTE DIVISION REGULATIONS, **E.P.A. NUMBER OKD032963530.**

THIS IS TO FURTHER CERTIFY THAT THIS MATERIAL WAS PURCHASED AND WILL BE USED FOR RECYCLING PURPOSES ONLY.

MADEWELL & MADEWELL, INC.

Caithy Hinson

COMPANY REPRESENTATIVE

B & T Metals
Profit Statement
24-Oct

Load: Industrial/Auto Batteries
Trailer No.: Madewell & Madewell
Date Shipped: 24-Oct

Metal Grade	Net Weight	Price Bought		Price Sold	
		Price Bought	Total	Price Sold	Total
Industrial Batteries	32769.00	\$ 0.24	\$ 7,864.56	\$ 0.31	\$ 10,158.39
Auto Batteries	13391.00	\$ 0.20	\$ 2,678.20	\$ 0.33	\$ 4,419.03
TOTALS:	46160.00		\$ 10,542.76		\$ 14,577.42

Price Sold Total	\$ 14,577.42
Price Bought Total	\$ 10,542.76
Net Profit	\$ 4,034.66

ALTERNATE STRAIGHT BILL OF LADING - SHORT FORM

Shipper #

Carrier # 2201Date 12-20-13

Smith Systems Transportation
(Name of Carrier)

Consignee	TO
	Quemetco West Quemetco, Inc 720 South 7th Avenue CITY OF INDUSTRY CA 91746 USA
Route	

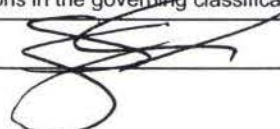
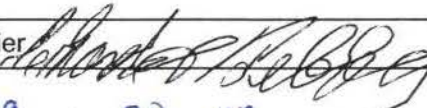
Shipper	FROM
	B+T Metals PO Box 2 Gering, NE 69341
Special	

Packaging, Articles, Special Marks, and	Skids	Product	Weight
UN2794, batteries, wet, filled with acid, 8, PGIII	1	Auto Type	1681
Loaded Per 49 CFR 173.159(E)		Ind Batt Cells	
	15	Industrial	42,650 42,650
RSR Contract # 4500219852		Steel Case	
Seal #		Scrap Lead	
This is to certify that the above named materials are properly		Other (description)	
described, classified, packaged, marked and labeled and are in			
proper condition for transportation according to the applicable			
regulations of the Department of Transportation.		GROSS WT	44,331
		TARE WT	601
24 Hour Emergency Response # _____		NET WT	43,730

REMIT C.O.D. Address	C.O.D. AMOUNT: \$	C.O.D. FEE PREPAID <input type="checkbox"/> COLLECT <input type="checkbox"/>
TO: ADDRESS:	If this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges. Signature of Consignor _____	TOTAL CHARGES \$ Freight charges are collect unless market prepaid. CHECK BOX IF PREPAID <input type="checkbox"/>

NOTE: Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is here specifically stated by the shipper to be not exceeding \$ _____ per

RECEIVED subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of packages unknown), marked consigned and destined as indicated above which said carrier (the word carrier being understood through this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery as said destination. If on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property, over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the Bill of Lading terms and conditions in the governing classification on the date of shipment. Shipper hereby certifies that he is familiar with all the Bill of Lading terms and conditions in the governing classification and the said terms and conditions.

Shipper  B+T Metals Owner	Carrier  S.S.T.
---	---

Purchase order

Billing Address

Corporate Offices:
Attn To: Accounts Payable
2777 N Stemmons Fwy Ste 1800
Dallas, TX 75207-2508
(214) 631-6070

Vendor Address/1022611

B & T Metals
1855 Third Street
GERING NE 69341
USA
Order Confirmed with:
Name:

Information

Document Number	4500219852
Date	12/13/2013
Vendor No.	1022611
Currency	USD
Buyer	Anita Maki
Phone	214-583-0256
E-Mail	AMaki@RSRCorp.com
Delivery Date	12/13/2013
RFQ Number:	
Vendor Quote / Proposal Number:	

Shipping Address

Quemetco, Inc
720 South 7th Avenue
City of Industry, CA 91746

Terms of payment :

Net due in 10 days

Currency USD

Terms of delivery :

FOB(Free on board) /GeringNE3087651997Shayne24h

USE SEAL ON TRAILER MINIMUM 42000 lbs

Item	Material/Description	Unit Price	Net Amount
10	20100 WHOLE BATTERIES-201	37.00 / 1 CWT	
20	20108 IND BATT CELLS-201H	37.00 / 1 CWT	
30	20109 INDUSTRIAL BATTERIES-201I	35.00 / 1 CWT	
40	20119 STEEL CASED BATTERIES-201S	35.00 / 1 CWT	
50	20113 MISC. BATTERIES-201M	35.00 / 1 LB	

SIGNATURE _____

(Purchasing)



CORPORATION

RECYCLING CERTIFICATE FOR SPENT LEAD ACID BATTERIES

RSR operates three subsidiary recycling facilities in the United States that receive and recycle lead-acid batteries:

Revere Smelting and Refining Company
65 Ballard Road, Middletown, NY 10941
EPA # NYD 030 485 288

Quemetco, Inc.
720 S. 7th Avenue, City of Industry, CA 91749
EPA # CAD 066 233 966

Quemetco, Inc.
7870 W. Morris Street, Indianapolis, IN 46241
EPA # IND 000 199 653

This document will acknowledge the receipt of lead-acid batteries at the subsidiary plant indicated below and acknowledges that the material was recycled in an environmentally safe manner in accordance with local, state and federal regulations, and is in full compliance with Section 3010 of the Resource Conservation and Recovery Act (RCRA).

Received from:	B & T Metals, Inc
Date of receipt:	12/27/2013
Reference number:	4500219852
Transporter:	Smith Systems
Receiving report #:	5000486240
Weight:	43,506 lbs
RSR plant location:	Quemetco West



Remittance Advice

B & T Metals Inc.
Shayne Michael Tower
1855 Third Street
Gering NE 69341

Quemetco, Inc.
2777 N Stemmons Fwy Ste 1800
Dallas, TX 75207-2508
(214)631-6070

Vendor No.: 1022611
Payment Date: 01/06/2014
Notification: Please use Check No. (Our payment document **2000280292**) to clear the items listed below

1 of 1

Invoice Number	Invoice	Reference No/PO #	Invoice Amount	Discount	Net Amount
5101507765	12/27/2013	5100079869-PO-4500219852	15,259.62	0.00	15,259.62
MATERIAL		PO NUMBER	WEIGHT	UOM	PRICE
WHOLE BATTERIES-201		4500219852	1,626.000	37.00 / CWT	601.62
INDUSTRIAL BATTERIES-201		4500219852	41,880.000	35.00 / CWT	14,658.00
Check Total					\$ 15,259.62
This ACH Payment has been processed and should be deposited into your account within 2 business days					

A F S Enterprises, Inc.
5019 Nighthawk Way
Oceanside, CA 92056

CARRIER CONFIRMATION AGREEMENT
Trip #041317

Attn: Ashley
Phone: (800) 897-5571
Fax: (308) 632-7973

From: Robert C Watters
Phone: (303) 986-0122
Fax: (303) 972-6975

Load Stop #1
B & T Metals Inc
1855 Third Street
Gering, NE
(308) 436-3720
Appt 01/20/14 01:00PM
PickUp #'s 4500222780

Unload Pick #1
Quemetco West L L C
720 S 7th Ave
City Of Industry, CA
(626) 330-2294 Ext 3230
Appt 01/23/14 10:30AM
Delivery #'s 221779 / 180071870

Arrived _____ Depart _____

Arrived _____ Depart _____

Comments

Dry Vans Only! Must Turn In Bill Of Lading, Weighmaster Certificate.

Cases: 0 Weight: 45000 Pallets: 0

ALTERNATE STRAIGHT BILL OF LADING - SHORT FORM

Shipper # _____

Carrier # _____

Date 1-20-14

Smith Systems Transportation
(Name of Carrier) via B&T Metals

Consignee	TO
	Quemetco West Quemetco, Inc 720 South 7th Avenue CITY OF INDUSTRY CA 91746 USA
Route	

Shipper	FROM
	B&T Metals PO Box 2 Gering, NE 69341
Special	

Packaging, Articles, Special Marks, and	Skids	Product	Weight
UN2794, batteries, wet, filled with acid, 8, PGIII	<u>9</u>	Auto Type	<u>25,065</u>
Loaded Per 49 CFR 173.159(E)	<u>7</u>	Ind Batt Cells	<u>21,397</u>
	<u>7</u>	Industrial	<u>21,397</u>
RSR Contract # 4500222780	<u>7</u>	Steel Case	<u> </u>
Seal #	<u> </u>	Scrap Lead	<u> </u>
This is to certify that the above named materials are properly	<u> </u>	Other (description)	<u> </u>
described, classified, packaged, marked and labeled and are in	<u> </u>		<u> </u>
proper condition for transportation according to the applicable	<u> </u>		<u> </u>
regulations of the Department of Transportation.	<u> </u>	GROSS WT	<u>46,462</u>
	<u> </u>	TARE WT	<u>621</u>
24 Hour Emergency Response # _____	<u>16</u>	NET WT	<u>45,841</u>

REMIT C.O.D. Address	C.O.D. AMOUNT: \$	C.O.D. FEE PREPAID <input type="checkbox"/> COLLECT <input type="checkbox"/>
TO: ADDRESS:	If this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges. Signature of Consignor _____	TOTAL CHARGES \$ Freight charges are collect unless market prepaid. CHECK BOX IF PREPAID <input type="checkbox"/>

NOTE: Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is here specifically stated by the shipper to be not exceeding \$ _____ per _____

RECEIVED subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of packages unknown), marked consigned and destined as indicated above which said carrier (the word carrier being understood through this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery as said destination. If on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property, over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the Bill of Lading terms and conditions in the governing classification on the date of shipment. Shipper hereby certifies that he is familiar with all the Bill of Lading terms and conditions in the governing classification and the said terms and conditions.

Shipper [Signature] B&T Metals Carrier



Quemetco, Inc.

Remittance Advice

Vendor Address

B & T Metals Inc.
Shayne Michael Tower
1855 Third Street
Gering NE 69341

Remittance Address

Quemetco, Inc.
2777 N Stemmons Fwy Ste 1800
Dallas, TX 75207-2508
(214)631-6070

Vendor No.: 1022611
Payment Date: 02/03/2014
Notification: Please use Check No. (Our payment document **2000288933**) to clear the items listed below

1 of 1

Invoice Number	Invoice	Reference No/PO #	Invoice Amount	Discount	Net Amount
5101514212	01/27/2014	5100083265-PO-4500222780	15,038.54	0.00	15,038.54
MATERIAL	PO NUMBER	BILL OF LADING	WEIGHT	UOM	PRICE
WHOLE BATTERIES-201	4500222780	N/A	24,524.000	41.00 / CWT	10,054.84
INDUSTRIAL BATTERIES-201	4500222780	N/A	13,115.000	38.00 / CWT	4,983.70
Check Total					\$ 15,038.54
This ACH Payment has been processed and should be deposited into your account within 2 business days					

B & T Metals
 Profit Statement
 20-Jan

Load: Industrial/Auto Batteries
 Trailer No.: Smith Systems Transportation
 Date Shipped: 20-Jan

Metal Grade	Net Weight	Price Bought		Price Sold	
		Price Bought	Total	Price Sold	Total
Industrial Batteries	13115.0	\$ 0.24	\$ 3,147.60	\$ 0.38	\$ 4,983.70
Auto Batteries	24524.0	\$ 0.25	\$ 6,131.00	\$ 0.41	\$ 10,054.84
TOTALS:	37639.00		\$ 9,278.60		\$ 15,038.54

Price Sold Total	\$ 15,038.54
Price Bought Total	\$ 9,278.60
Net Profit	\$ 5,759.94



Safety-Kleen Systems, Inc.
6628 Coal Rd

Casper, WY, 82601-1501

March 26, 2014

9-17-13

Jeff McClure

OMEGA CAPITAL
130900 Lockwood Rd,
Gering, NE 69341-5212

Dear Jeff McClure:

Thank you for helping me better understand your business processes and needs. Below is a proposal aimed to help you address the following strategic initiatives you are currently pursuing:

- Lower costs by analyzing overall waste streams and identifying cost saving initiatives including bundled offers, lower transportation costs and use of
- Minimize waste generation through recommendations on technology use and disposal techniques
- Reduce risk through Safety-Kleen rigorous operating procedures and guarantee of assurance and indemnification
- Improve consistency of reporting & billing
- Provide single source for environmental services
- Anticipate waste generation tier movement and make recommendations in advance of increased requirements

We propose delivering the following services:

Description	Price Per Service	Service Frequency in Weeks	Qty	
Pay for used oil per gallon USED OIL SERVICE PREQUAL CHECK	-0.18 per gal	24	3000	

Quote is valid for 30 days.

Date: _____

Customer Name: _____

Customer Title: _____

Customer Signature: _____



Safety-Kleen supports more than 330,000 businesses across North America by recycling their used oil and industrial waste, and delivering environmentally friendly cleaning products and services. Customers choose Safety-Kleen because of our personal service, extensive liability protection and focus on sustainable solutions. Our goal is to provide customers like OMEGA CAPITAL with the best solutions while keeping your company in balance with the environment.

I look forward to reviewing this proposal with you at your earliest convenience.
Sincerely,

Dirk Bowman
Market Sales Specialist
Dirk.Bowman@safety-kleen.com

Safety-Kleen Systems, Inc.

ATTACHMENT 9 Page 28 of 32

9-17-13



TERMS AND INSTRUCTIONS

ECO-BAT
TECHNOLOGIES LTD

- Use RSR bill of lading and fill out scrap items being shipped in detail; include separate weight of each scrap item and number of skids. The preceding is mandatory.
- In case of weight discrepancy, RSR weights and grades will govern.
- Use seal to lock back trailer doors. Seal number to be written on bill of lading.
- Any claim must be in writing within 60 days of receipt of material.
- Non lead batteries (Nickel Cadmium, Lithium, Hybrid, Alkaline, etc.), Absolyte and missile batteries are not acceptable material and may be subject to a disposal fee, or material returned to supplier at supplier's expense.
- Wheel weights are not acceptable.
- Scrap lead consists of clean lead solids, free of other materials such as dross, battery plates, lead covered cable, foil, type metals, aluminum, zinc, iron, bismuth, collapsible tubes, brass fittings, and radioactive materials. Cable lead and range lead is not acceptable. Any radioactive markings on an item is a mandatory rejection.
- Review specification and get approval from buyer before making a sale or shipment.
- All material must be palletized and secured to pallets.
- Prices are based on picking up a minimum of 42,000 pounds of NET material, loads less than 42,000 pounds are subject to a dead freight charge.
- Extra labor will be charged for batteries in plastic bags, individually boxed batteries, wires attached or poorly packaged shipment.
- No pallet weight over 5,000 pounds without approval from buyer.



CORPORATION

RECYCLING CERTIFICATE FOR SPENT LEAD ACID BATTERIES

RSR operates three subsidiary recycling facilities in the United States that receive and recycle lead-acid batteries:

Revere Smelting and Refining Company
65 Ballard Road, Middletown, NY 10941
EPA # NYD 030 485 288

Quemetco, Inc.
720 S. 7th Avenue, City of Industry, CA 91749
EPA # CAD 066 233 966

Quemetco, Inc.
7870 W. Morris Street, Indianapolis, IN 46241
EPA # IND 000 199 653

This document will acknowledge the receipt of lead-acid batteries at the subsidiary plant indicated below and acknowledges that the material was recycled in an environmentally safe manner in accordance with local, state and federal regulations, and is in full compliance with Section 3010 of the Resource Conservation and Recovery Act (RCRA).

Received from:	B & T Metals, Inc
Date of receipt:	01/24/2014
Reference number:	4500222780
Transporter:	Smith Systems
Receiving report #:	5000486240
Weight:	37,639 lbs
RSR plant location:	Quemetco West

Quemetco, Inc
720 South 7th Avenue
City of Industry, CA 91746

Page 1 of 7
01/10/2014 06:49:42

Purchase order

Billing Address

Corporate Offices:
Attn To: Accounts Payable
2777 N Stemmons Fwy Ste 1800
Dallas, TX 75207-2508
(214) 631-6070

Vendor Address/1022611

B & T Metals Inc.
Shayne Michael Tower
1855 Third Street
GERING NE 69341
Order Confirmed with:
Name:

Information

Document Number 4500222780
Date 01/10/2014
Vendor No. 1022611
Currency USD
Buyer Anita Maki
Phone 214-583-0256
E-Mail AMaki@RSRCorp.com
Delivery Date 01/10/2014
RFQ Number:
Vendor Quote / Proposal Number:

Shipping Address

Quemetco, Inc
720 South 7th Avenue
City of Industry, CA 91746

Terms of payment :

Net due in 10 days

Currency USD

Terms of delivery :

FOB(Free on board) /GeringNE3087651997Shayne24h

USE SEAL ON TRAILER MINIMUM 42000 lbs

Item	Material/Description	Unit Price	Net Amount
10	20100 WHOLE BATTERIES-201	41.00 / 1 CWT	
20	20108 IND BATT CELLS-201H	41.00 / 1 CWT	
30	20109 INDUSTRIAL BATTERIES-201I	38.00 / 1 CWT	
40	20119 STEEL CASED BATTERIES-201S	38.00 / 1 CWT	
50	20113 MISC. BATTERIES-201M	38.00 / 1 CWT	

SIGNATURE _____

(Purchasing)

LITHIUM BATTERIES

We do not want or accept lithium batteries

Lithium batteries are dangerous, due to their chemistry & history of fires and are explosive

Lithium batteries jeopardize the safety of our employees

Also, lithium batteries place the supplier's employees at a safety risk

The lithium battery disposal fee is \$9 per pound under 100 pounds/ non-negotiable

Lithium battery shipments in excess of 100 pounds will have a disposal fee of \$9 per pound and/or option that supplier may get the batteries in return at a cost of \$250 per drum (special packaging is required) and the freight cost. The supplier has 24 hours to decide on option or will be charged \$9 per pound

Revised 09/05/2013

Omega Capital, Gering, NE GPS Readings
Collected During 3/25-26/2014 RCRA Inspection

<u>Location</u>	<u>Latitude</u>	<u>Longitude</u>	<u>Date</u>
Area 1	41.815392	-103.638045	3/26/2014 10:07
Area 2	41.815233	-103.637807	3/26/2014 10:15
Area 3	41.816057	-103.639072	3/26/2014 10:29
Areas 4 and 5	41.816795	-103.638238	3/26/2014 11:06
Area 6	41.81689	-103.638638	3/26/2014 11:08
Area 7	41.816908	-103.638873	3/26/2014 11:26
Area 9	41.816532	-103.639013	3/26/2014 11:21
Area 10	41.816502	-103.638573	3/26/2014 11:22
Area 11	41.817098	-103.638393	3/26/2014 11:35
Area 13	41.81729	-103.639022	3/26/2014 11:48
Area 14	41.81803	-103.638928	3/26/2014 12:02
Area 15	41.81832	-103.638288	3/26/2014 12:10

PHOTO LOG

Facility Name / City: Omega Capital, LLC
Gering, NE

Facility ID #: Non-notifier (will be assigned NER000004077)

Date : March 25-26, 2014

Photographer: Dedriel Newsome

Type of Camera: Olympus Stylus 720 SW, Serial #: A93671407 for first 36 photos.

Digital Recording Media: Flashcard

All digital photos were copied by: Dedriel Newsome on 4/18/14 *AKW*

All digital photos were copied to: CD-R

Original copy is stored in: CD-R. Digital photos were downloaded to CD-R all by Dedriel Newsome.

No changes were made in the original image files prior to storage on the CD-R. *AKW*

Report Photo #	Photographer	Date	Approx. Time	File Name (DSCN0xxx.jpg)	Description
1	Dedriel Newsome	03/25/14	12:57 PM	711	Inventory item #2 listed on attachment 4B. The facility location is shown on attachment 4B, page 1.
2	Dedriel Newsome	03/25/14	1:06 PM	712	Inventory item #3 listed on attachment 4B. The facility location is shown on attachment 4B, page 1.
3	Dedriel Newsome	03/25/14	1:06 PM	713	Inventory item #3 listed on attachment 4B. The facility location is shown on attachment 4B, page 1.
4	Dedriel Newsome	03/25/14	1:18 PM	714	Battery Area – Scrap lead bars removed from top of batteries that are to be sent for recycling.
5	Dedriel Newsome	03/25/14	1:22 PM	715	Inventory item #4 listed on attachment 4B. The facility location is shown on attachment 4B, page 1.
6	Dedriel Newsome	03/25/14	1:26 PM	716	Inventory item #5 listed on attachment 4B. The facility location is shown on attachment 4B, page 1.
7	Dedriel Newsome	03/25/14	1:27 PM	717	Inventory item #5 listed on attachment 4B. The facility location is shown on attachment 4B, page 1.
8	Dedriel Newsome	03/25/14	1:28 PM	718	Inventory item #5 listed on attachment 4B. The facility location is shown on attachment 4B, page 1.
9	Dedriel Newsome	03/25/14	1:36 PM	719	Inventory item #6 listed on attachment 4B. The facility location is shown on attachment 4B, page 1.
10	Dedriel Newsome	03/25/14	1:43 PM	720	Inventory item #7 listed on attachment 4B. The facility location is shown on attachment 4B, page 1.
11	Dedriel Newsome	03/25/14	1:44 PM	721	Inventory item #7 listed on attachment 4B. The facility location is shown on attachment 4B, page 1.
12	Dedriel Newsome	03/25/14	1:48 PM	722	Inventory item #6 listed on attachment 4B. The facility location is shown on attachment 4B, page 1.
13	Dedriel Newsome	03/25/14	1:52 PM	723	Battery Area – Locomotive battery transport container (container was tilted on side for photo) with small holes drilled into each leg.

Report Photo #	Photographer	Date	Approx. Time	File Name (DSCN0xxx.jpg)	Description
14	Dedriel Newsome	03/25/14	1:59 PM	724	Inventory item #8 listed on attachment 4B. The facility location is shown on attachment 4B, page 1.
15	Dedriel Newsome	03/25/14	2:01 PM	725	Inventory item #9 listed on attachment 4B. The facility location is shown on attachment 4B, page 1.
16	Dedriel Newsome	03/25/14	2:04 PM	726	Inventory item #10 listed on attachment 4B. The facility location is shown on attachment 4B, page 1.
17	Dedriel Newsome	03/25/14	2:07 PM	727	Inventory item #11 listed on attachment 4B. The facility location is shown on attachment 4B, page 1.
18	Dedriel Newsome	03/25/14	2:19 PM	728	Inventory item #13 listed on attachment 4B. The facility location is shown on attachment 4B, page 1.
19	Dedriel Newsome	03/25/14	2:22 PM	729	Inventory item #14 listed on attachment 4B. The facility location is shown on attachment 4B, page 1.
20	Dedriel Newsome	03/25/14	2:32 PM	730	Inventory item #15 listed on attachment 4B. The facility location is shown on attachment 4B, page 1.
21	Dedriel Newsome	03/25/14	2:32 PM	731	Inventory item #15 listed on attachment 4B. The facility location is shown on attachment 4B, page 1.
22	Dedriel Newsome	03/25/14	2:32 PM	732	Inventory item #15 listed on attachment 4B. The facility location is shown on attachment 4B, page 1.
23	Dedriel Newsome	03/25/14	2:49 PM	733	Inventory item #20 listed on attachment 4B. The facility location is shown on attachment 4B, page 1.
24	Dedriel Newsome	03/25/14	2:49 PM	734	Inventory item #19 listed on attachment 4B. The facility location is shown on attachment 4B, page 1.
25	Dedriel Newsome	03/25/14	2:50 PM	735	Inventory items #16 and #17 listed on attachment 4B. The facility location is shown on attachment 4B, page 1.
26	Dedriel Newsome	03/25/14	2:51 PM	736	Inventory items #15 and #18 listed on attachment 4B. The facility location is shown on attachment 4B, page 1.
27	Dedriel Newsome	03/25/14	2:51 PM	737	Inventory item #16 listed on attachment 4B. The facility location is shown on attachment 4B, page 1.
28	Dedriel Newsome	03/25/14	3:43 PM	738	HW Storage Area – Inventory listed on attachment 4A (left to right, rows 1 thru 4). The universal waste lamps are stored behind racks against wall on left. The facility location is shown on attachment 7B.
29	Dedriel Newsome	03/25/14	3:43 PM	739	Inventory item #2 listed on attachment 4A. See photo 28 and attachment 7B for location.
30	Dedriel Newsome	03/25/14	3:44 PM	740	Inventory items #21 thru #24 listed on attachment 4A. See photo 28 and attachment 7B for location.
31	Dedriel Newsome	03/25/14	3:50 PM	741	Inventory item #33 listed on attachment 4A. See photo 28 and attachment 7B for location. Also, open 8ft box of universal waste lamps laying on floor and 4ft box leaning against the wall.
32	Dedriel Newsome	03/25/14	3:50 PM	742	Inventory item #33 listed on attachment 4A. See photo 28 and attachment 7B for location. Also, open 8ft box of universal waste lamps laying on floor and 4ft box leaning against the wall.
33	Dedriel Newsome	03/25/14	4:07 PM	743	Inventory item #21 listed on attachment 4B. The facility location is shown on attachment 4B, page 1.

Report Photo #	Photographer	Date	Approx. Time	File Name (DSCN0xxx.jpg)	Description
34	Dedriel Newsome	03/25/14	4:07 PM	744	Inventory item #21 listed on attachment 4B. The facility location is shown on attachment 4B, page 1.
35	Dedriel Newsome	03/25/14	4:08 PM	745	Inventory item #21 listed on attachment 4B. The facility location is shown on attachment 4B, page 1.
36	Dedriel Newsome	03/25/14	4:13 PM	746	Inventory item #22 listed on attachment 4B. The facility location is shown on attachment 4B, page 1.
37	Dedriel Newsome	03/25/14	4:21 PM	747	Inventory item #1 listed on attachment 4B. The facility location is shown on attachment 4B, page 1.
38	Dedriel Newsome	03/26/14	8:43 AM	748	Inventory item #10 listed on attachment 4A. See photo 28 and attachment 7B for location.
39	Dedriel Newsome	03/26/14	8:44 AM	749	Close-up of one of the labels on the drums located in the HW Storage Area shown in photo 28.
40	Dedriel Newsome	03/26/14	8:54 AM	750	(facing N) – Inventory item #1 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.
41	Dedriel Newsome	03/26/14	8:56 AM	751	(facing SE) – Inventory item #1 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.
42	Dedriel Newsome	03/26/14	8:56 AM	752	(facing N) – Inventory item #1 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.
43	Dedriel Newsome	03/26/14	8:57 AM	753	(facing NW) – Inventory item #1 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.
44	Dedriel Newsome	03/26/14	8:57 AM	754	(facing N) – Inventory item #1 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.
45	Dedriel Newsome	03/26/14	9:01 AM	755	(facing N) – Inventory item #1 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.
46	Dedriel Newsome	03/26/14	9:08 AM	756	(facing NE) – Inventory item #2 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.
47	Dedriel Newsome	03/26/14	9:09 AM	757	(facing NE) – Inventory item #2 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.
48	Dedriel Newsome	03/26/14	9:23 AM	758	(facing S) – Inventory item #3 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.
49	Dedriel Newsome	03/26/14	9:23 AM	759	(facing N) – Inventory item #3 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.
50	Dedriel Newsome	03/26/14	9:24 AM	760	(facing NW) – Inventory item #3 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.
51	Dedriel Newsome	03/26/14	9:39 AM	761	(facing NE) – Inventory item #4 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.
52	Dedriel Newsome	03/26/14	9:40 AM	762	(facing NE) – Inventory item #4 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.
53	Dedriel Newsome	03/26/14	9:45 AM	763	(facing E) – Inventory item #4 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.
54	Dedriel Newsome	03/26/14	9:50 AM	764	(facing SW) – Inventory item #4 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.

Report Photo #	Photographer	Date	Approx. Time	File Name (DSCN0xxx.jpg)	Description
55	Dedriel Newsome	03/26/14	9:51 AM	765	(facing NE) – Inventory item #4 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.
56	Dedriel Newsome	03/26/14	9:51 AM	766	(facing NE) – Inventory item #4 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.
57	Dedriel Newsome	03/26/14	9:52 AM	767	(facing NE) – Inventory item #4 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.
58	Dedriel Newsome	03/26/14	9:52 AM	768	(facing N) – Inventory item #4 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.
59	Dedriel Newsome	03/26/14	9:57 AM	769	(facing NW) – Inventory item #4 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.
60	Dedriel Newsome	03/26/14	9:59 AM	770	(facing N) – Inventory item #5 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.
61	Dedriel Newsome	03/26/14	10:00 AM	771	(facing SW) – Inventory item #5 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.
62	Dedriel Newsome	03/26/14	10:07 AM	772	(facing NE) – Inventory item #6 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.
63	Dedriel Newsome	03/26/14	10:09 AM	773	(facing S) – Inventory item #7 listed on attachment 4C. The facility location is shown on attachment 4C, page 1.
64	Dedriel Newsome	03/26/14	10:10 AM	774	(facing SW) – Inventory item #8 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.
65	Dedriel Newsome	03/26/14	10:13 AM	775	(facing S) – Inventory item #8 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.
66	Dedriel Newsome	03/26/14	10:14 AM	776	(facing S) – Inventory item #8 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.
67	Dedriel Newsome	03/26/14	10:15 AM	777	(facing E) – Inventory item #8 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.
68	Dedriel Newsome	03/26/14	10:21 AM	778	(facing SE) – Inventory item #8 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. Close-up of photo 67.
69	Dedriel Newsome	03/26/14	10:30 AM	779	(facing E) – Inventory item #9 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.
70	Dedriel Newsome	03/26/14	10:35 AM	780	(facing S) – Inventory item #10 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.
71	Dedriel Newsome	03/26/14	10:40 AM	781	(facing SW) – Inventory item #11 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.
72	Dedriel Newsome	03/26/14	10:43 AM	782	(facing NE) – Inventory item #11 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.
73	Dedriel Newsome	03/26/14	10:43 AM	783	(facing NW) – Inventory item #11 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.
74	Dedriel Newsome	03/26/14	10:51 AM	784	(facing SW) – Inventory item #11 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.

Report Photo #	Photographer	Date	Approx. Time	File Name (DSCN0xxx.jpg)	Description
75	Dedriel Newsome	03/26/14	10:58 AM	785	(facing W) – Old Battery Storage Area as noted on “Scrap Batt” sign. This area is noted as Area 14 on attachment 4C, page 1 and GPS reading included on attachment 10.
76	Dedriel Newsome	03/26/14	11:05 AM	786	(facing NE) – Inventory item #12 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.
77	Dedriel Newsome	03/26/14	11:06 AM	787	(facing SW) – Inventory item #12 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10.

Omega Capital Photographs

Gering, NE

3/25-26/2014

Photos taken by Dedriel Newsome

DN



PHOTO 1, 3/25/2014 – Inventory item #2 listed on attachment 4B. The facility location is shown on attachment 4B, page 1. D. Newsome *DN*



PHOTO 3, 3/25/2014 – Inventory item #3 listed on attachment 4B. The facility location is shown on attachment 4B, page 1. D. Newsome *DN*



PHOTO 2, 3/25/2014 – Inventory item #3 listed on attachment 4B. The facility location is shown on attachment 4B, page 1. D. Newsome *DN*



PHOTO 4, 3/25/2014 – Battery Area – Scrap lead bars removed from top of batteries that are to be sent for recycling. D. Newsome *DN*



PHOTO 5, 3/25/2014 – Inventory item #4 listed on attachment 4B. The facility location is shown on attachment 4B, page 1. D. Newsome *DN*



PHOTO 7, 3/25/2014 – Inventory item #5 listed on attachment 4B. The facility location is shown on attachment 4B, page 1. D. Newsome *DN*



PHOTO 6, 3/25/2014 – Inventory item #5 listed on attachment 4B. The facility location is shown on attachment 4B, page 1. D. Newsome *DN*



PHOTO 8, 3/25/2014 – Inventory item #5 listed on attachment 4B. The facility location is shown on attachment 4B, page 1. D. Newsome *DN*

looking inside washer



filter

PHOTO 9, 3/25/2014 – Inventory item #6 listed on attachment 4B. The facility location is shown on attachment 4B, page 1. D. Newsome *DN*



PHOTO 10, 3/25/2014 – Inventory item #7 listed on attachment 4B. The facility location is shown on attachment 4B, page 1. D. Newsome *DN*



Burnt

Mixed

PHOTO 11, 3/25/2014 – Inventory item #7 listed on attachment 4B. The facility location is shown on attachment 4B, page 1. D. Newsome *DN*



filters
+ foam
sheet

PHOTO 12, 3/25/2014 – Inventory item #6 listed on attachment 4B. The facility location is shown on attachment 4B, page 1. D. Newsome *DN*



PHOTO 13, 3/25/2014 – Battery Area – Locomotive battery transport container (container was tilted on side for photo) with small holes drilled into each leg. D. Newsome



PHOTO 15, 3/25/2014 – Inventory item #9 listed on attachment 4B. The facility location is shown on attachment 4B, page 1. D. Newsome



PHOTO 14, 3/25/2014 – Inventory item #8 listed on attachment 4B. The facility location is shown on attachment 4B, page 1. D. Newsome



PHOTO 16, 3/25/2014 – Inventory item #10 listed on attachment 4B. The facility location is shown on attachment 4B, page 1. D. Newsome



PHOTO 17, 3/25/2014 – Inventory item #11 listed on attachment 4B. The facility location is shown on attachment 4B, page 1. D. Newsome *ND*



PHOTO 18, 3/25/2014 – Inventory item #13 listed on attachment 4B. The facility location is shown on attachment 4B, page 1. D. Newsome *ND*



PHOTO 19, 3/25/2014 – Inventory item #14 listed on attachment 4B. The facility location is shown on attachment 4B, page 1. D. Newsome *ND*



PHOTO 20, 3/25/2014 – Inventory item #15 listed on attachment 4B. The facility location is shown on attachment 4B, page 1. D. Newsome *ND*



PHOTO 21, 3/25/2014 – Inventory item #15 listed on attachment 4B. The facility location is shown on attachment 4B, page 1. D. Newsome *DN*



PHOTO 22, 3/25/2014 – Inventory item #15 listed on attachment 4B. The facility location is shown on attachment 4B, page 1. D. Newsome *DN*



PHOTO 23, 3/25/2014 – Inventory item #20 listed on attachment 4B. The facility location is shown on attachment 4B, page 1. D. Newsome *DN*



PHOTO 24, 3/25/2014 – Inventory item #19 listed on attachment 4B. The facility location is shown on attachment 4B, page 1. D. Newsome *DN*

evaporator unit



PHOTO 25, 3/25/2014 – Inventory items #16 and #17 listed on attachment 4B. The facility location is shown on attachment 4B, page 1. D. Newsome *DN*



PHOTO 26, 3/25/2014 – Inventory items #15 and #18 listed on attachment 4B. The facility location is shown on attachment 4B, page 1. D. Newsome *DN*

locking inside floor sump next to evaporator



PHOTO 27, 3/25/2014 – Inventory item #16 listed on attachment 4B. The facility location is shown on attachment 4B, page 1. D. Newsome *DN*



PHOTO 28, 3/25/2014 – HW Storage Area – Inventory listed on attachment 4A (left to right, rows 1 thru 4). The universal waste lamps are stored behind racks against wall on left. The facility location is shown on attachment 7B. D. Newsome *DN*



PHOTO 29, 3/25/2014 – Inventory item #2 listed on attachment 4A. See photo 28 and attachment 7B for location. D. Newsome *DNW*



PHOTO 31, 3/25/2014 – Inventory item #33 listed on attachment 4A. See photo 28 and attachment 7B for location. Also, open 8ft box of universal waste lamps laying on floor and 4ft box leaning against the wall. D. Newsome *DNW*



PHOTO 30, 3/25/2014 – Inventory items #21 thru #24 listed on attachment 4A. See photo 28 and attachment 7B for location. D. Newsome *DNW*



PHOTO 32, 3/25/2014 – Inventory item #33 listed on attachment 4A. See photo 28 and attachment 7B for location. Also, open 8ft box of universal waste lamps laying on floor and 4ft box leaning against the wall. D. Newsome *DNW*



PHOTO 33, 3/25/2014 – Inventory item #21 listed on attachment 4B. The facility location is shown on attachment 4B, page 1. D. Newsome *DNW*



PHOTO 34, 3/25/2014 – Inventory item #21 listed on attachment 4B. The facility location is shown on attachment 4B, page 1. D. Newsome *DNW*



PHOTO 35, 3/25/2014 – Inventory item #21 listed on attachment 4B. The facility location is shown on attachment 4B, page 1. D. Newsome *DNW*



PHOTO 36, 3/25/2014 – Inventory item #22 listed on attachment 4B. The facility location is shown on attachment 4B, page 1. D. Newsome *DNW*



PHOTO 37, 3/25/2014 – Inventory item #1 listed on attachment 4B. The facility location is shown on attachment 4B, page 1. D. Newsome *ND*

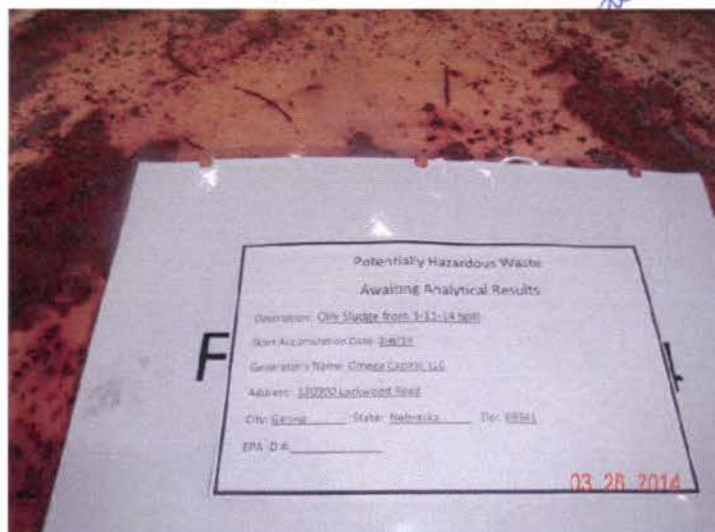


PHOTO 39, 3/26/2014 – Close-up of one of the labels on the drums located in the HW Storage Area shown in photo 28. D. Newsome *ND*



PHOTO 38, 3/26/2014 – Inventory item #10 listed on attachment 4A. See photo 28 and attachment 7B for location. D. Newsome *ND*



PHOTO 40, 3/26/2014 (facing N) – Inventory item #1 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *ND*



PHOTO 41, 3/26/2014 (facing SE) – Inventory item #1 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *ND*



PHOTO 43, 3/26/2014 (facing NW) – Inventory item #1 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *ND*



PHOTO 42, 3/26/2014 (facing N) – Inventory item #1 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *ND*



PHOTO 44, 3/26/2014 (facing N) – Inventory item #1 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *ND*



PHOTO 45, 3/26/2014 (facing N) – Inventory item #1 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome



PHOTO 46, 3/26/2014 (facing NE) – Inventory item #2 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome



PHOTO 47, 3/26/2014 (facing NE) – Inventory item #2 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome



PHOTO 48, 3/26/2014 (facing S) – Inventory item #3 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome



PHOTO 45, 3/26/2014 (facing N) – Inventory item #1 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *DN*



PHOTO 46, 3/26/2014 (facing NE) – Inventory item #2 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *DN*



PHOTO 47, 3/26/2014 (facing NE) – Inventory item #2 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *DN*



PHOTO 48, 3/26/2014 (facing S) – Inventory item #3 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *DN*



PHOTO 49, 3/26/2014 (facing N) – Inventory item #3 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *DN*



PHOTO 50, 3/26/2014 (facing NW) – Inventory item #3 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *DN*



PHOTO 51, 3/26/2014 (facing NE) – Inventory item #4 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *DN*



PHOTO 52, 3/26/2014 (facing NE) – Inventory item #4 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *DN*



PHOTO 53, 3/26/2014 (facing E) – Inventory item #4 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *DN*



PHOTO 54, 3/26/2014 (facing SW) – Inventory item #4 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *DN*



PHOTO 55, 3/26/2014 (facing NE) – Inventory item #4 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *DN*



PHOTO 56, 3/26/2014 (facing NE) – Inventory item #4 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *DN*



PHOTO 57, 3/26/2014 (facing NE) – Inventory item #4 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *DN*



PHOTO 59, 3/26/2014 (facing NW) – Inventory item #4 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *DN*



PHOTO 58, 3/26/2014 (facing N) – Inventory item #4 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *DN*



PHOTO 60, 3/26/2014 (facing N) – Inventory item #5 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *DN*



PHOTO 61, 3/26/2014 (facing SW) – Inventory item #5 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *DN*



PHOTO 62, 3/26/2014 (facing NE) – Inventory item #6 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *DN*



PHOTO 63, 3/26/2014 (facing S) – Inventory item #7 listed on attachment 4C. The facility location is shown on attachment 4C, page 1. D. Newsome *DN*



PHOTO 64, 3/26/2014 (facing SW) – Inventory item #8 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *DN*



PHOTO 65, 3/26/2014 (facing S) – Inventory item #8 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *DNW*



PHOTO 66, 3/26/2014 (facing S) – Inventory item #8 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *DNW*



PHOTO 67, 3/26/2014 (facing E) – Inventory item #8 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *DNW*



PHOTO 68, 3/26/2014 (facing SE) – Inventory item #8 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. Close-up of photo 67. D. Newsome *DNW*



PHOTO 69, 3/26/2014 (facing E) – Inventory item #9 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *NSU*



PHOTO 71, 3/26/2014 (facing SW) – Inventory item #11 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *NSU*



PHOTO 70, 3/26/2014 (facing S) – Inventory item #10 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *NSU*



PHOTO 72, 3/26/2014 (facing NE) – Inventory item #11 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *NSU*

*sandblast
Avg. 1/2
trailer
with
blasting
unit*

*overhead
door where
unit leaked
from*



PHOTO 73, 3/26/2014 (facing NW) – Inventory item #11 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *DW*



PHOTO 74, 3/26/2014 (facing SW) – Inventory item #11 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *DW*



PHOTO 75, 3/26/2014 (facing W) – Old Battery Storage Area as noted on "Scrap Batt" sign. This area is noted as Area 14 on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *DW*



PHOTO 76, 3/26/2014 (facing NE) – Inventory item #12 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *DW*

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PHOTO 77, 3/26/2014 (facing SW) – Inventory item #12 listed on attachment 4C. The facility location is shown on attachment 4C, page 1 and GPS reading included on attachment 10. D. Newsome *DN*